

The ESG and Students' Involvement in European Quality Assurance of Higher Education

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Master Thesis
European Master in Higher Education

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UNIVERSITY OF OSLO

Spring 2010

Abstract

This thesis is an empirical analysis of the nature of compliance of European external QA agencies with the ESG's criterion on students' inclusion on external review panels. The data derived from the reports of the panels of ENQA coordinated reviews of various European QA agencies is used as the main source for this study, agencies' self-evaluation reports and articles on students' engagement and participation in QA activities are used as secondary source materials.

The *new institutional theory* and overview of cultural/value/norm systems dominating within the *Higher Education* sector have been applied to explore, clarify and justify variations and similarities detected among European QA agencies in respect to students' inclusion in their local activities. A classification of QA agencies has been made in accordance with three pillars of institutions: *Regulative*, *Normative*, *Cultural-Cognitive* and three mechanisms of compliance: *Coercive*, *Normative* and *Mimetic* prevailing within the individual agency's structure/culture while adopting the ESG's requirements.

This study's major finding is an enhanced theoretical understanding of the factors explaining the variations in the practices of students' inclusion in QA agencies' activities, exploring the extent to which European QA agencies are adapting to the requirement of students' engagement in external reviews of HEIs and identifying the value added by having student representatives in peer review panels. The classification invented by me also gives a different approach to the explored topic and presents the research findings in a precise and novel form of typology.

Acknowledgments

Diving into an unexplored topic and inventing my tiny piece of an innovative research would not have been possible without the attentive guidance and precise instructions given in the research process by my two efficient supervisors: Mr. Bjørn Stensaker and Mr. Leon Cremonini. Motivation to deeply explore this particular topic and put even more efforts into my research has been prompted by their explicit and constructive feedback/corrections. Therefore I am more than eager to express my sincere gratitude for their support and suggestions given throughout the research process.

I want to thank Mr. Bjørn Stensaker personally for provoking my interest in Quality Assurance issues by his enthusiastic and enlightening lectures and studies. I also wish to thank Mr. Peter Maassen and Mr. Harry de Boer for their enriching and informative lectures.

Being a part of HEEM 2010 programme has been the most challenging and exciting experience of my life-time and I wish to specially thank all my lovely classmates for all those unforgettable memories we lived and experienced together.

Sincerely,

Nino Pataraia

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THE LIST OF ABBREVIATIONS

- ACSUCYL=Quality Assurance Agency for the University System in Castilla y León**
- ACSUG=The Agency for Quality Assurance in the Galician University System**
- ACQUIN=Accreditation, Certification and Quality Assurance Institute (Germany)**
- AEQES=Agence pour l’Evaluation de la Qualité de l’Enseignement Supérieur organisé ou subventionné par la Communauté française**
- AGAE=the Agency for Quality Assurance in Higher Education and Research of Andalusia**
- AHPGS=Accreditation Agency for Study Programmes in Health and Social Sciences (Germany)**
- ANECA=The National Agency for the Quality Assessment and Accreditation of Spain**
- ARACIS=Agency for Quality Assurance in Higher Education (Romania)**
- ASIIN=Accreditation Agency Specialized in Accrediting Degree Programmes in Engineering, Informatics, the Natural Sciences and Mathematics (Germany)**
- AQA=Austrian Agency for Quality Assurance**
- AQAS=Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (Germany)**
- AQU=The Agency for QA in the Catalan University System**
- CTI=Commission des Titres d'Ingénieur (France)**
- EHEA=European Higher Education Area**
- ENQA=The European Network for Quality Assurance in Higher Education**
- ESG=The European Standards and Guidelines**
- EUA=The European University Association**
- ECCE=The European Council on Chiropractic Education in ENQA community**
- EVA=Danish Evaluation Institute**
- EVALAG=Evaluation Agency Baden-Wuerttemberg (Germany)**
- FHR=The Austrian FH Council**

FIBAA=Foundation for International Business Administration Accreditation (Germany)

FINHEEC=Finnish Higher Education Evaluation Council

GAC=German Accreditation Council

HAC=Hungarian Accreditation Committee

HE=Higher Education

HEI=Higher Education Institution

HETAC=Higher Education and Training Awards Council (Ireland)

IUQB=Irish Universities Quality Board

NAA=National Accreditation Agency of the Russian Federation

NAHE=National Agency for Higher Education (Sweden)

NEAA=National Evaluation and Accreditation Agency (Bulgaria)

NOKUT=Norwegian Agency for Quality Assurance in Education

NVAO=The Accreditation Organization of the Netherlands and Flanders

NQAI=National Qualifications Authority of Ireland

OAQ =Center for Accreditation and Quality Assurance of the Swiss Universities

OAR= Austrian Accreditation Council

PKA=The State Accreditation Committee (Poland)

QA=Quality Assurance

QAA=Quality Assurance Agency for Higher Education (UK)

SKVC=Centre for Quality Assessment in Higher Education

SPARQS=Student Participation in Quality Scotland

VLHORA=Council of Flemish Institutions of Higher Education

VLIR – QAU=Flemish Interuniversity Council Quality Assurance Unit

VSS-UNES-USU= Verband Schweizer Studierendenschaften, Union des Etudiant-e-s de Suisse, Unione Svizzera degli Universitari/ The National Union of Students in Switzerland - Network

ZevA=Central Evaluation and Accreditation Agency Hannover (Germany)

1 Introduction

1.1 Background

National contexts (expansion of Higher Education: increased size and variety of Higher Education Institutions and HE Systems, diversification of HE, changing funding methods/formulae) have given rise to growing concerns about quality in HE and have prompted the need for formal management and the emergence of national systems for its assessment (Brennan and Shah 2001). Also other motives such as “limits (or reductions) to public budgets, increasing demands for transparency in general and governmental approaches giving preferences to ex post evaluation over ex ante regulation” have accentuated the necessity for Quality Assurance in the HE field (Van Vught and Westerheijden 1994, In, Westerheijden *et al.* 2007:15).

Over the past 20 years, the concept of quality has become one of the most dominating and influential “meta-ideas” globally penetrating both the private and the public sectors (Micklethwait and Wooldridge, 1996). US observers Cameron and Whetten (1996) even argued that in the mid-1990s the concept of quality had in fact substituted the notion of effectiveness as the central organization-level variable in HE and succeeded in becoming the pre-eminent construct itself. Although it has always been hard to define what actually constitutes quality in HE and due to its complicated nature, various facets, different perception of actors about its nature and purpose *quality* has been defined in various ways, for instance as “value, conformance to specifications, conformance to requirements, fitness for use, loss avoidance, or meeting and/or exceeding customer expectations” (Reeves and Bednar 1994: 419). Debate about the purpose of quality has been continuous due to the ambiguity of the term itself (justified by the argument that quality has been “a loosely defined concept” (Stensaker 2007: 4)), some perceiving quality as excellence, some as “fitness for purpose” and others as the factor prompting HEIs become more responsive to societal demands for graduates by equipping them with readily usable knowledge and skills in the job market. Different actors perceive the value of quality differently, as they have different goals in their interaction with the HE system (for instance for the government Quality represents a means to control HE, urging it to stay accountable for invested tax money; for employers it represents justification for graduates’ employability; for academic staff and students it constitutes to the

quality of student experience and preferably better product) and therefore those actors also have different justifications why they pay close attention to the aspect of quality (Westerheijden *et al.* 2007).

Today's reality is that Quality has become a central theme in the HE field and "quality assurance schemes are being developed in HE systems as one of the necessary instruments to adapt HEIs to the increasing demands put upon them within the states' economy and society, and equally to prepare or adapt the states' systems for the increasing impacts of globalization on HE" (Vlk 2006, In, Westerheijden *et al.* 2007:13). No matter which specific purpose/approach QA takes in HE (QA as: *excellence*: focusing on effectiveness of the process at work in the institution or programme while fulfilling its objectives and mission; *fitness for purpose*: fulfilling a customer's requirements, needs or desires; *value for money*: using effectively and efficiently inputs invested in processes and mechanisms of QA activities; *transformation*: focusing on student-oriented QA- enhancing and empowering students, adding value to students through their learning experience; *a threshold*: defining a threshold for quality means by setting certain norms and criteria (any programme or institution required to reach certain norms and criteria to be deemed to be of quality); *consumer satisfaction*: closely linked to the growing importance of the market forces in HE, focusing on the importance of the external expectations of consumers and stakeholders; *enhancement or improvement*: searching for continuous improvement, stressing the responsibility of HEIs to make the best use of institutional autonomy and freedom; *control*: implying punitive-rewarding process of quality assessment, etc.) (Vlasceneanu *et al.* 2007: 70-73), if it is taken in its meaning of something exceptional, of excellence (Harvey and Green 1993), then must be acknowledged as the core value in HE-"making higher education "higher", as without striving for excellence, there would be no way to distinguish HE from skills training" (Westerheijden *et al.* 2007: 13).

According to Bjorn Stensaker (2007) QA is not merely the latest fad, but a remarkably successful management fashion - a success that is sustained by government endorsement as it provides a means of securing accountability. QA ensures not only accountability but also a degree of compliance to policy requirements. However, the fundamental idea about QA encourages to establish the right regulations and routines and not to interfere in how those goals are achieved. By applying the marketplace as a coordination mechanism for HE, governments were prompted to encourage HEIs' autonomy, grant them the freedom of

decision-making and support the enhancement of their capacity to adapt to the competitive and constantly changing environment. Institutions' freedom to define their own strategies under the conditions of market-like competition has challenged governments' steering ability and policy efficiency. Therefore nowadays "quality assessment might be seen as a government tool to regain some degree of control over institutions" (Westerheijden *et al.* 2007: XI).

Policies to internationalize HEIs have brought about a strong need to enhance the quality of HE/foster harmonization of HE systems and those identified objectives have become the driving forces behind regional quality assessment activities. At present "Quality Assurance issues are to a growing extent internationalized and rapidly becoming an intrinsic part of a more globalised HE sector" (Van Vught *et al.* 2002: 20). Nevertheless it should not be forgotten that inherent dynamics of policy processes taking place in different national contexts are likely to challenge the conception that internationalization and globalization will unquestionably lead to harmonization and less diversity. There is always a possibility that the global ideas and practices will be interpreted quite differently in various contexts and the spread of ideas in HE will be surrounded with complexities originating from the fact that "HE is embedded in context of regulation, funding, and other policy instruments, in economic circumstances and in specific societies and cultures" (Westerheijden *et al.* 2007: 21).

Shifts to a market orientation in HE have brought changes to QA objectives and have influenced its preference in applying appropriate approaches while dealing with QA issues. Nowadays widely used QA approaches emphasize the role/voice of customers/stakeholders in HE and bring the fulfillment of the requirement to satisfy their needs/expectations to the forefront of QA activities and objectives. For example, an *output-oriented approach in Quality* focuses on the issues of the value for money, consumer satisfaction, committing zero errors; a *transformative/improvement-oriented approach* emphasizes the role of those actors who actually make a difference in teaching/learning processes (implying teachers and students); a *customer approach to QA* also reflects the development of a market attitude within the HE sector encouraging more direct attention to responding/satisfying the changing needs/aspirations/demands/expectations of direct/indirect customers and stakeholders. But who can we regard as the major stakeholders in HE? Certainly those who pay for it and as a consequence benefit from it. In other words, students, who invest the time, efforts and money in their education (contributing to their studies financially), and consequently anticipate to be

rewarded for such an investment. The shift to giving more importance to learning by students: acknowledging them as “an active co-producers, bringing their previous knowledge and spending intellectual efforts in order to make teaching into learning” (Westerheijden 2008: 6) rather than to professionals’ teaching has modified students’ position in teaching/learning processes and has granted them more liability to have a say about those activities. The necessity not only to satisfy, but to “delight” customers’ needs, the need to demonstrate accountability to stakeholders about HE’s adequate performance , and the turnaround to student-centered views of education have also reshuffled students’ position in the HE field and necessitated their more active involvement in HE procedures. Nevertheless, securing their full engagement and provoking their capacity to contribute with fruitful and constructive input can only be achieved if they themselves acknowledge the importance and benefits of their engagement and “develop a sense of ownership of the quality issues” (EUA Publications 2006: 27). The Introduction’s next section will take a closer look at the modified role of students in QA, and identify those factors that have triggered students’ dynamic participation.

1.2 Students' Involvement in QA

There are number of factors that have necessitated the involvement of multiple internal and external actors in negotiating, defining and obtaining common understanding of standards through continuous communication, including the currently evolved participative quality culture, the orientation to more development-oriented and value-based aspects, the increased emphasis on “democratizing” quality by making everyone involved in the production process responsible (i.e. giving appropriate responsibility to all key actors) and perceiving students not only as products, but rather as participants in a transformative learning experience. The intention of those standards is not to restrict individual actors to “develop and unfold their potential”, but “lead to more flexibility and inspire innovation instead of streamlining and homogenizing individual efforts, which can reinforce harmonizing general institutional and local standards and ensuring general standards work as guidelines for orientation” (EUA Case Studies 2008:16).

As the quality culture communicates a connotation of quality as a shared value and a collective responsibility for all members of an institution, including students, then students should not be considered less authoritative in QA activities nor deprived from their rights to participate in evaluation procedures, express their viewpoints and provide constructive feedback to QA issues. They should be permitted to contribute actively to preserving and enhancing quality culture within the HE community. As one of university's essential goals is to focus/enhance student learning (adopt the customer orientation approach), it should allow students' active engagement not only in learning activities, but also in providing the appropriate feedback and reflections on the teaching techniques, learning processes and achievements.

Acknowledging this necessity has led in recent years the whole of Europe to recognize students' role in assuring the quality of HE. Today, student engagement is increasingly regarded both inevitable and desirable. “Students' voices are today being heard loudly and clearly and, ever more often, their views are being taken seriously” (ENQA 2006: Alaniska *et al.* 2006: 5).

As a result, students have become actively involved in the enhancement processes of their own learning experiences through providing feedback on the taken courses, contributing to the development of learning and teaching techniques in their subject areas, taking part in

university decision making processes, expressing students' viewpoints and perceptions through student unions/student representative bodies. As a rule, students' participation takes various ways (formal and informal) within and outside of their own institutions, but as I am interested in how students are involved at the external QA agency level, I will only summarize their role in this specific context. Finding students with suitable and adequate competence for external evaluation of HEIs should not be more challenging than finding any other members of experts' panels, thus this factor should not be regarded as a constraint for including them in the external review panels. After appointing students to the panel, they are likely to take on several simultaneous roles in the external panels conducting institutional evaluations. For example, they might represent expert members of the evaluation/accreditation teams (including/excluding position of chair/secretary), be observers in the evaluation/accreditation teams, be planners of those processes, be involved in ranking/benchmarking exercises, obtain full membership or observer status in the decision making body for accreditation/evaluation or obtain full membership or observer status in the agency's board/senior committees or project groups; they can be involved in the preparation or approval of the institution's self-evaluation report, participate in the preparation and submission of specific student-written reports to the review team during the evaluation or accreditation process, can appear as an interviewer during the evaluation or accreditation process by the review team, etc. (ENQA 2006: Alaniska *et al.* 2006: 33). Student members represented on the panel can certainly perceive the situation from the perspective of a student and of a learner. In some cases elected students have a background as student representatives at the institutional or the national level, therefore their understanding and insight of the HE system, and especially of students' concerns, is very thorough, which cannot be as clear (concerning students' issues/expectations/perspectives) for other panel members. As students "often have a balanced view of the aim of the academic institution; on the cultural, political and historical aspects of the academic community; on the institutions' role in society and on the future of academic tradition" they should be regarded as equal partners in the academic community and be recognized as full committee members (ENQA 2006: Alaniska *et al.* 2006: 9). While some argue that students lack sufficient academic experience or insight in the organizational aspects of an institution to be included as full members in expert committees, others believe that this is not such a serious hindrance compared to the fact that some professors cannot comprehend the necessity of modern teaching methods. As the main goal of evaluation is the creation of better learning outcomes (by giving feedback on creating a

system where the HEIs function at their best with better learning conditions), and since they are the main assets of the teaching/learning process, students should be given the legitimacy to have their say in evaluations conducted by external panels.

In some cases agencies acknowledge the necessity for students' participation, but they still face challenges finding proficient students with appropriate competence, some encounter problems recruiting them due to students' lack of interest in participating in external reviews. Finding competent students is even harder in those countries where students have traditionally been scarcely represented at the faculty/institutional boards and where earlier practice of student involvement in educational and QA activities was absent. When facing difficulties with finding suitable students for evaluations, questions about the appropriateness of recruitment techniques are raised (whether to use advertisements, nominations from institutions or through student unions, etc); therefore every agency needs to recognize the fact that the overall success of recruitment depends strongly on the clarity about defined expectations and roles for participating students rather than on recruitment technique. Even after hiring students for the panel, some QA agencies are confronted with the challenge to obtain the legitimacy of the student experts in the eyes of the professors under evaluation and their ability to train students appropriately for the review processes is questioned. Student participation in the decision-making bodies of agencies is not universal among ENQA members and their voting status varies as well. Some appear solely as observers while others are equipped with full voting rights. Regardless of their status, appreciation of the overall added-value of students' inclusion in agencies' operations is overwhelmingly high, as they are expected to bring a different viewpoint to assessment: "the quality is observed from a very important position that nobody else can cover. The student may be regarded as customer, raw material, part of the process and as the end product. The student representative will bring in new or unexpected ideas that in themselves improve the assessment" (ENQA 2006: Alaniska *et al.* 2006: 37).

How significantly students' role is perceived in QA usually depends on students' reputable position in the overall academic community and the context in this respect greatly varies among European countries. In some countries the necessity for students' involvement is emphasized during the development of the QA systems and HEIs are supported by providing adequate trainings to create a more student-oriented QA system. If we take the perspective which places the emphasis of QA on the quality of learning rather than on teaching, then we

should not question the inevitability and significance of the role played by students in assessment processes. Students can be regarded as experts in learning processes, as they themselves acknowledge how they reach their learning outcomes and comprehend in what ways teaching contributes to their learning process. But treating students as experts is a cultural expectation, which requires a positive attitude both from the staff and from the students as well. In some cases it takes even years to create an atmosphere where students' feedback is regarded constructive. As learning can only be accomplished through tight cooperating between teachers and students, staff should be responsible to treat students as partners and establish a positive atmosphere for cooperation leading to an open and authentic QA: "The notion of partnership between students and staff members represents the possibility of an authentic and constructive dialogue which offers the opportunity for more reflective feedback" (ENQA 2006: Alaniska *et al.* 2006: 15).

There are various blocks from which the *European Higher Education Area* is constructed; one of its essential elements is the push to involve students more actively in QA processes. To promote students' involvement universities should organize training courses preparing students for participation in external assessment committees and also promote students' involvement in decision-making bodies within HEIs. Despite the fact of how strongly students' participation is encouraged throughout Europe, there are still cases where students' participation is minimal. "Difficulties in engaging students do not solely lie with the personalities of the student representatives concerned, but are also due to features and practices that institutions themselves have control over" (ENQA 2006: Alaniska *et al.* 2006: 27). Hence explanations for lack of students' participation could also vary depending whose viewpoint we take: experts "blame" students for not demonstrating adequate interest for participation in QA procedures, but if we judge from students' perspective "they feel that it is not possible for them to influence the running of the institution". (ENQA 2006: Alaniska *et al.* 2006: 17). The main obstacle for participating students is that they find it hard to make themselves seen as collaborators in the process, frequently they are regarded as merely passive receivers of the training process and are not given an opportunity to become essential players in the planning and governance of university institutions.

Various factors can be identified which have prompted/encouraged students' inclusion in the QA of HE but, amongst others, the *Bologna Process*, *Berlin Communiqué* (2003) and the *European Standards and Guidelines* are of particular importance because they recognize

students as full partners in the governance of higher education and their involvement in the QA of HE as significant and inevitable because their “participation in external assessment gives greater credibility to the quality assurance process by taking into account the point of view of other stakeholders involved in the process” (ENQA 2006: Alaniska *et al.* 2006:21). The ministers note that national legal measures for ensuring student involvement are largely in place throughout the EHEA, but they still “call on institutions and student organizations to identify ways of increasing actual student involvement in HE governance” (ENQA 2006: Alaniska *et al.* 2006: 17). For this purpose adequate networks have to be set up in which the universities, teaching staff and student associations collaboratively encourage student engagement in QA processes in a natural and progressive way and at all levels. By granting a voice to students and providing them with the opportunity to comment upon quality, standards and the student experiences, they will become valid and active participants of QA activities.

1.3 Research Interests and Relevance

Since quality systems have become an established and accepted part of HE, the level of interest for its theory and practice has dramatically increased and the volume of research in this area still remains high. The motivation for conducting my research on students' involvement in European QA has been triggered by two facts, namely that (a) recently students' involvement in QA activities has gained its significance on HE agendas (national and supranational levels) and (b) in spite of the attention directed to these particular issues, studies addressing this topic are still relatively scant. Therefore my research's main goal is to contribute to enhancing the theoretical knowledge on students' role/engagement in European QA. Analyzing practices of those countries where students' participation has been active and well-developed could be beneficial for those countries which are taking initial steps in establishing students' involvement practices in their QA activities. My research aims specifically to address the following question: *what are the drivers and hindrances for including students in European QA?* To analyze the above-mentioned issue, I will need to explore various coexisting factors and circumstances applicable to different national contexts simultaneously and step by step. According to the ESG every European external QA agency is obliged to have a predetermined strategy for students' participation and procedures for nomination/appointment of experts, including criteria for the use of representatives of stakeholders such as employers and students in their external review panels. In spite of a determined strategy applicable to every European QA agency, we know little about how this set strategy for students' involvement is implemented within individual QA agency's culture, therefore in the initial stage I will explore the implementation procedures and only subsequently analyze if any variations can be detected in the practices of students' inclusion and identify those factors prompting such variations. Hence sub questions of my research are:

1. What are possible explanations for variation in how students are included in QA?
2. To what extent are European QA agencies adapting to the requirement of including students in external review of HEIs defined by the ESG?
3. What can be seen as the value added by having students included in peer review panels?

The main source for the data collection will be documentary analysis (i.e. the reports of the panels of the ENQA coordinated reviews of European External QA Agencies), which are usually rich in portraying the values and beliefs of participants in the setting/material culture. The interest level of my research will be at the national level through supranational perspectives and guidelines set by the ESG (Assessing European External QA Agency's compliance with the ESG's criterion on students' participation in external review panels). For the analytical/ theoretical framework I will use B. Clark, W. Richard Scott's and A. Gornitzka's perspectives on the value/belief systems existing in the HE field (intrinsic factors strongly emphasized in the old institutionalism) and the *new institutional theory* (strongly emphasizing extrinsic conditions) to explain/justify how external QA agencies are likely to perceive/respond/comply with the ESG's requirement on students' inclusion in external review panels.

1.4 Structure of the Thesis

The thesis commences with the introduction chapter exploring those factors which have necessitated the evolvement of QA in the HE field and influenced QA of HE to become more responsive to stakeholders' needs and requirements. Next, students' role in HE and QA activities are brought in. Finally, part of the introduction explores the current trends existing in QA of HE and analyzes the ESG's requirements at national, agency and institutional levels. The 2nd chapter of the thesis presents the research's theoretical framework and justifies the applicability and relevance of the *old/new institutional theory* to the research questions. By exploring environment, structure, belief and norms system existing within and outside of QA agencies from the *old/new institutional theory's* perspective, I will manage to identify the factors causing variations in practices of students' involvement in European QA and justify detected variations on the ground of well established perceptions. The 3rd chapter of the thesis presents the empirical results derived from the ENQA coordinated reports, analyzing to what extent European QA agencies are adapting to the requirement of including students in external review of HEIs. The 4th chapter analyzes the findings of the research and classifies European external QA agencies under the three pillars of organizations: Regulative, Normative or Cultural-Cognitive due to their nature of compliance with the ESG's criterion on students' participation in external review panels. The concluding chapter presents the accomplishments of the research, identifies its advantages/limitations and suggests recommendations for further exploration of the research topic.

1.5 Trends in European QA: Background for the ESG

QA in HE is not only a European concern. Interest in quality and standards has dramatically risen all over the world. However, since Europe desires to become the most dynamic and knowledge-based economy in the world, its HE needs to prove that sufficient attention is paid to the quality of programmes offered and at the same time ensure that effective means for assuring and demonstrating quality are put in place. Today, the need for developing a European dimension for QA has thus gained prominence. As a result the ministers of the Bologna Process signatory states have requested the European Network for Quality Assurance in Higher Education (ENQA) to develop “an agreed set of standards, procedures and guidelines on quality assurance” and “establish a widely shared set of underpinning values, expectations and good practice in relation to Quality and its assurance, by institutions and agencies across the European Higher Education Area” (ENQA Report 2009: 6). Proposed standards and guidelines support the spirit of the “July 2003 Graz Declaration” of the European University Association (EUA) which notes that “the purpose of a European dimension to quality assurance is to promote mutual trust and improve transparency while respecting the diversity of national contexts and subject areas” (ENQA Report 2009:14). Similar to the concept of “QA” which cannot have only one definition to cover all circumstances, the word “standards” can be applied in a variety of ways all across Europe ranging from “narrowly defined regulatory requirements to more generalized descriptions of good practice” and can be reinterpreted at local context of national HE systems (ENQA Report 2009:13). Thus, the ESG as a matter of fact take the leadership style that inspires rather than dictates; those regulations do not appear as blueprint, but provide the room for adapting to local contexts. The EHEA consisting of forty states is characterized by its diversity of political systems, HE systems, socio-cultural and educational traditions, languages, aspirations, which makes it quite inappropriate to apply a single monolithic approach to quality, standards and QA in HE. However the ESG do not in fact intend to take “a narrow, prescriptive and highly formulated approach to standards”, they favor more “the generic principle to the specific requirement” which actually ensure their broader acceptance by providing a healthier basis for uniting different HE communities across the EHEA (ENQA Report 2009:12); the ESG promote the application of the generic standards, which find more general resonance at the national level of signatory states. Nevertheless those standards and

guidelines are still designed to be applicable to all HEIs and QA agencies in Europe irrespective of their structure, function and size and the national system within which they operate. The standards, being neither too detailed nor too prescriptive, are meant to ensure that “the professionalism, credibility and integrity of the agencies are visible and transparent to their stakeholders and must permit comparability to be observable among agencies and allow the necessary European Dimension” (ENQA Report 2009: 24).

1.6 The European Standards and Guidelines

Applying agreed standards and guidelines is meant to enhance the consistency of QA across the EHEA (meeting the need for a common understanding of QA in European HE), assist HEIs and QA agencies to use common framework of reference for managing their QA systems/procedures and disseminating the best practices around Europe. Compliance to those standards is meant to clarify and improve the credibility of the work of European QA agencies and enable the various QA agencies to relate to each other.

The ESG provide a good basis for new start-ups in the quality process, ensure the transparency and aim to lead to comparability, better European integration, a potential basis for international co-operation and a better global standing for European HE. To some extent, the ESG are a logical framework that does not define anything new, but arranges and systematizes existing practices. Those standards are bases for ensuring that the agencies' external evaluation processes systematically follow the same techniques. The ESG smooth the progress of comparisons and mutual recognition between agencies and the results of the evaluations or accreditations conducted by them (ENQA Report 2009)

The ESG are in principle a set of guidelines on how to conduct different aspects of QA in HE and they specify some expectations in the form of quality standards. The ESG provide a framework that suggests improvement, but simultaneously enable other purposes, although the lack of a sole clear purpose falls under its main weaknesses. Without a doubt the ESG are ultimately about improvement but, as they are used top down (externally rather than internally), they face difficulty in persuading institutions to improve. To handle this difficulty they try to integrate QA into enhancement approaches and unite external and internal QA processes for this purpose. Hence external agencies are obliged to take responsibility to ensure that they develop processes that take forward institutional initiatives and not impose an external framework that is burdensome and alien to local contexts (ENQA Report 2009).

The Basic Principles, Purposes and Objectives of the ESG

The ESG are based on the following basic principles about QA:

- HE providers should have the key responsibility for the quality of their provision and assurance;

- Interests of society in respect to the Quality and Standards of HE should be protected, the quality of academic programmes should be enhanced for students/other beneficiaries of HE across the EHEA and efficiency of organizational structure for effective provision of academic programmes should be ensured;
- Transparency should be maintained while using external expertise;
- HEIs should be encouraged to develop internal quality culture, demonstrate accountability for the investment of public and private money and demonstrate quality not only at home but as well internationally;
- QA for accountability purposes should always be compatible with QA for enhancement purposes.

The key purposes of the ESG include

- Enhancing available education for students in HEIs in the EHEA;
- Providing source of assistance to HEIs in handling and improving the quality (simultaneously mitigating their institutional autonomy);
- Forming a background for QA agencies in their activities and making external QA more understandable for participants;

The ESG Objectives are:

- Assist HEIs encourage vibrant intellectual and educational achievement;
- Assisting HEIs and agencies in developing own culture of QA;
- Raise the expectations of HEIs, students, employers, stakeholders around the processes and achievements of HE;
- Contribute to a common frame of reference for the provision of HE and the assurance of quality within the EHEA.

It could require considerable time for the internal and external QA standards to be widely adopted by institutions and agencies, as “their acceptance greatly depends on a willingness to change and develop on the part of signatory states with already long established and powerful

HE systems” (ENQA Report 2009:34). Proposed recommendations for internal QA standards might appear quite demanding for some HEIs, particularly in those cases where QA and emphasis on students’ needs have been the novel, recently established traditions and yet not well embedded in the institutional culture. Same obstacles could also appear in external QA agencies’ contexts, as they will need to analyze their established practices and measure them against the European expectations. Unless the benefits of adoption of new standards are acknowledged, their acceptance will be greatly challenged.

European Standards and Guidelines are defined for internal QA within HEIs, for external QA of HE and QA of external QA agencies.

European Standards and Guidelines for Internal QA within HEIs:

To prevent institutions from becoming slaves to the ESG and limiting their creativity in developing own QA systems, imposed standards should not exceed the advisory function. The ESG reinforce the principle that institutions are responsible for their own quality and point out that institutions are meant to develop their own QA procedures and not rely on the agency or government.

1.1 Policy and Procedures for QA: Institutions need to have a policy and related procedures for assuring quality and standards for their programmes/awards. They need to dedicate their efforts to develop the culture which acknowledges the significance of QA throughout their operation. In order to succeed in this respect, institutions need to develop and put into practice a strategy for the continuous enhancement of quality. Institutional strategy, policy, procedures need to have a formal status, be available to public and clearly underline a role for students and other stakeholders in it.

Guidelines: Formal policies need to provide a framework within which HEIs can develop and monitor the efficiency of their QA systems. They should include the statements of intentions and means how to accomplish them. The policy statement should cover the relationship between teaching and research, the institutional strategy for quality and standards, responsibilities of constituents of institutions for the assurance of quality, students’ participation and procedures how the policy is carried out, monitored and modified.

1.2 Approval, monitoring and periodic review of programmes and awards: Institutions should put in practice the formal techniques for periodic review and monitoring of available programmes and awards.

Guidelines: Programmes need to be well designed, periodically monitored and assessed in order to ensure students and stakeholders' confidence in their quality; therefore the QA of programmes and awards need to underline precisely intended learning outcomes, pay special consideration to the design and content of the curriculum, ensure adequate learning resources, monitor the progress and accomplishment of students, conduct regular reviews of programmes, obtain feedback from employers, labor market representatives and encourage students' participation in QA activities.

1.3 Assessment of students: Published criteria, regulations and procedures should be used consistently for students' assessment.

Guidelines: As outcomes of assessment have profound effects on students' future careers, they should be carried out professionally all the time. They need to assess the accomplishment of the intended learning outcomes, be "diagnostic, formative, summative" depending on their purpose, have approved criteria for marking and be subject to administrative verification examinations to guarantee the accuracy of the procedures. Students need to be aware which assessment strategy/ criteria will be applied to evaluate their performance in the programme.

1.4 Quality assurance of teaching staff: Institutions should ensure that the teaching staff is qualified and competent enough to be involved in the teaching processes.

Guidelines: Teachers are the vital resources available to students. Thus, those in charge of teaching should have a comprehensive knowledge of the subject they teach, ability to transmit their knowledge and access to the feedback they receive on their performance. All the teaching staff should possess a sufficient level of competence, therefore in case of demonstrating inefficiency in teaching, further opportunities should be given to upgrade their skills to a desirable level, but be excluded from teaching duties if failing in enhancement of their teaching abilities.

1.5 Learning resources and student support: Adequate resources should be provided to support student learning.

Guidelines: Physical resources (library, computing facilities, human support: counselors, advisers, tutors) should be readily accessible to students. The efficiency of services available to students should be regularly inspected and enhanced.

1.6 Information systems: Institutions need to compile, comprehend and apply relevant information to ensure the efficient management of their study programmes and other activities.

Guidelines: Institutions should possess tools to compile and assess information about their activities. Special attention should be given to student progression/success rates, employability of graduates, students' satisfaction with programmes, efficiency of teacher, etc.

1.7 Public Information: Objective, up to date and impartial information (Quantitative/Qualitative) about the programmes and awards should be publicly available.

Guidelines: HEIs are required to offer information about offered programmes, the intended learning outcomes, the teaching, learning and assessment strategies. Available information should not serve the purpose of marketing and should be precise, impartial and objective.

European Standards and Guidelines for the External QA of HE:

2.1 Use of internal QA procedures: External QA procedures need to take into consideration the effectiveness of the internal QA processes.

Guidelines: The institutions' internal policies and procedures should be attentively assessed in the course of external procedures in order to conclude to what extent the standards are complied.

2.2 Development of external QA processes: the aims and objectives of QA should be developed before the processes are themselves put into operation and subsequently published.

Guidelines: External QA methods should be developed in cooperation with key stakeholders (including HEIs). The procedures should cover the aims, objectives and descriptions of the procedures.

2.3 Criteria for decisions: All formal decisions of external QA activity should be based on explicit published criteria.

Guidelines: For the sake of equity and reliability all the decisions should be based on published criteria, interpreted in a reliable manner and reflect recorded evidence.

2.4 Processes fit for purpose: All external QA processes should be developed in a way to ensure their fitness to accomplish the defined aims and objectives.

Guidelines: Agencies should function according to defined and published objectives. In order to ensure validity, trustworthiness and value of review processes the experts carrying out the external QA activities should be equipped with adequate skills and competence to execute their duty; appropriate training should be provided for experts before they commence their work, international experts and students' participation should also be encouraged; sufficient evidence should be available to justify achieved conclusions.

2.5. Reporting: Published reports should be clear and easily accessible to intended publics. Recommendations and decisions should be easily spotted in the reports for readers.

Guidelines: Special care should be given to the structure, style, content of the reports to ensure their readability to the audience. They should include analysis, conclusions and recommendations.

2. 6. Follow-up procedures: A predetermined follow-up procedure should be put in action once a subsequent action plan is required after giving recommendations.

Guidelines: As QA continuously aims to do a better job not limiting itself only to external scrutiny events, every published report should include a structured follow-up procedure to guarantee that given recommendations are handled and implemented appropriately.

2.7. Periodic review: External QA of institutions/programmes to be carried out on a cyclical basis.

Guidelines: As QA is a dynamic process, it should remain continuous, hence needs to be periodically renewed. Consequent reviews should comprehend if any progress has been made since the previous activity.

2.8. System-wide analyses: Summary reports analyzing the wide-ranging findings from reviews, evaluations, assessments to be produced by QA agencies periodically.

Guidelines: As all external QA agencies compile comprehensive information about individual programmes and institutions, the obtained information can be used as the material for structured analyses across whole HE systems. Those analyses can offer practical information about existing trends, enhancement processes, emerging good practices, weaknesses and difficulties existing in the system and become useful tools for policy development and quality improvement (ENQA Report 2009).

European Standards and Guidelines for External QA Agencies:

The ESG emphasize the role of external QA and contain a set of standards for agencies that wish to be considered as consistent and professional in the performance of their functions in the EHEA. Although in some cases the ESG are at odds with national regulations and traditions, as every local agency operates in the context and idiosyncrasy of its national HE system. Therefore questions are usually raised around the ESG, if they can be perceived as generic principles which can be fulfilled in different ways taking into consideration the national context, or should be regarded as strict rules to be followed literally and step by step. According to the ESG every agency needs to take the formal responsibility for external QA, but in those countries with extensive HE system, there can be more than one agency handling different responsibilities of QA without competing with one another. The ESG require agencies to have clear and explicit goals and objectives for their work, enclosed in a publicly available statement (information to cover the division of labor between the agency and relevant stakeholders especially HEIs, also the cultural and contextual aspects of their work, etc). According to the ESG agencies need to remain independent to the extent which guarantees that they have autonomous responsibility for their operations and the conclusions/recommendations made in their reports are not influenced by the third parties such as HEIs, ministries and stakeholders. QA is carried out for various purposes by external agencies (ranging from safeguarding the national academic standards for HE to enhancement and improvement of quality). External agencies around Europe vary as “they reflect the legal, social and cultural requirements of the jurisdictions and environments in which they operate” (ENQA Report 2009:16). Also processes undertaken by external agencies are likely to vary due to their diversified purposes, some more focused on the enhancement of quality, while others more concerned with the provision of strong consumer protection. Proposed standards usually reproduce the best practices across Europe (highlighting the value for institutional autonomy; bringing interests of students, labor market representatives at the forefront of

external QA processes and application of the results from institutional internal QA activities) and do not aim to offer very detailed direction about what is to be inspected and how QA activities are meant to be carried out; those matters are meant to remain within the national autonomy; although the exchange of information amongst agencies and authorities is likely to prompt “the emergence of convergent elements” in some cases (ENQA Report 2009:16).

Number of European external QA agencies has dramatically increased since the early 1990s and cooperation and sharing of best practices amongst them have become an indivisible part of this development. “The European standards for external QA agencies have been developed on the premises of this development in the young history of European external QA” (ENQA Report 2009:24).

3. 1. Use of external QA procedures for HE: The external QA of agencies should take into consideration effectiveness of the external QA processes.

Guidelines: The standards which reflect best practices and experiences obtained through the development of external QA in Europe should be integrated into the processes used by external QA agencies towards the HEIs.

3.2 Official Status: Agencies should be formally approved and established on the legal basis and comply with the legislative jurisdiction within which they operate.

3.3 Activities: Conduct external QA activities: evaluation, review, audit, assessment, accreditation (at institutional or programme level) on a regular basis.

3.4. Resources: Agencies should possess adequate human and financial resources to plan and carry out their external QA processes in an efficient manner.

3.5. Mission statement: Agencies need to have explicit goals/objectives for their operation available through public statements.

Guidelines: Those statements should illustrate the aims and objective of agencies’ QA processes and the division of labor with relevant stakeholders. Adequate documentation should be available which clearly shows how those statements are transformed into an explicit policy and management strategy.

3.6. Independence: Agencies need to remain autonomous in their operations and their conclusions/recommendations should not be influenced by 3rd parties (HEIs, ministries and other stakeholders).

Guidelines: Legislative acts and instruments of governance should ensure independent functioning of agencies from HEIs and governments. Appointment of external experts and conclusions of QA processes need to be made autonomously and independently from governments, HEIs and political dominance. Even though stakeholders and students are consulted in the process of QA, the final conclusions should remain the liability of the agency.

3.7. External QA criteria and processes used by the agencies: The processes, criteria and procedures applied by agencies should be pre-defined and publicly available and include:

- A self-assessment of the QA process
- **An external assessment by a group of experts, including, as appropriate, (a) student member (s), and site visits as decided by the agency**
- Publication of a report covering decisions, recommendations, formal conclusions
- A follow-up procedure

Guidelines: Agencies should stick to affirmed principles, guarantee all procedures are handled with competence and conclusions are achieved in a consistent manner. Appeal procedures should be determined in the light of the constitution of each agency.

3.8. Accountability procedures: Agencies need to have procedures for their accountability measures in place.

Guidelines: Policy for the assurance of the quality of the agency should be accessible on the website, available documentation should prove that the agency's procedures and accomplishments are in line with its mission and objectives of QA; the agency should encourage a no-conflict-of-interest mechanism in the work of external experts; Each agency should have internal QA procedures which contain an internal feedback mechanism (compiling feedback from the staff and the council/board), an internal reflection mechanism (having techniques to respond to internal/external recommendations for enhancement) and an

external feedback mechanism (obtain feedback from experts and evaluated institutions) for the sake of analyzing its own development and enhancement. Each agency should have an obligatory cyclical external review of their operations at least once in every five years.

Peer Review System for QA Agencies:

Peer review of agencies should be used as the tool “to accomplish the goal of transparency, visibility and comparability of quality of agencies” (ENQA Report 2009:28).

Having described the ESG’s role, purpose and criteria for different levels of QA in HE field, I want to further explore how those standards are interpreted through the cultural and belief systems existing within different European QA agencies. As the focus of my study is to observe the compliance with the ESG’s criterion on students’ inclusion on external panels specifically on the agency level, I will analyze QA agency’s internal and external environments, existing cultural, normative, cognitive belief systems/norms within those environments and their possible influence on agency’s strategies and reactions to the externally imposed regulations and standards.

2 Theoretical Framework

The theories presented in this section will assist me to understand two different but inter-related issues: detected similarities and differences among European QA agencies while implementing the ESG's criterion on students' inclusion. For interpreting the nature of compliance I applied integration of two different institutional theories: *The old institutionalism* emphasizing institutional peculiarities and traditional ways of carrying through institutional changes and *the neo institutional theory* emphasizing influences prompted by extrinsic conditions'. One and the same requirement is likely to be responded either with similar or diversified attitude; therefore in the commencing part of this chapter I present Burton Clarks' perspective on value/norms and belief systems existing within each individual QA agency accounting for observable differences among agencies functioning in the similar field. Later on the *new institutional theory's perspective* will be brought in to explain the detected general tendency among European agencies in acknowledging the necessity and inevitability for students' dynamic involvement in spite of their individual characteristics, values, norms, belief systems and national contexts.

2.1 Student Involvement in QA: An Issue Dependent on Values, Norms and Beliefs?

As I intend to explore the practices of students' involvement in external review panels of HEIs at different European external QA agencies and explain why those similarities and differences exist among them, I decided to bring my attention to the values and beliefs' systems dominating within HE and external QA agencies in respect to students' role/inclusion and find out if those variations/similarities have been caused by those factors. Hence, I decided to grasp the understanding of the cultural aspects, values and beliefs existing within local HE Systems and external QA agencies in respect to the students' role, comprehend how students' role is perceived and what position they are entitled to possess within the academia or QA agencies. There is general agreement that students' voice can be heard and gain its legitimacy only if local circumstances provide appropriate ground for such happenings. Hence, for ensuring their genuine acceptance to QA activities by other influential actors, appropriate measures should be put in action to enhance the knowledge about its benefits and incorporate its need into the local quality culture of HE community. My interest in

investigating the cultural aspects (traditions, past experiences, values, norms and beliefs) of the agency in order to explain the grounds for current and potential practices of students' inclusion has promoted me to refer to Burton Clark, as he has done an exceptional work in exploring organizational culture/value and belief systems and explaining organizational change/compliance/reaction stemming from those essential factors in response to the requirements imposed by external environment/circumstances and trends. According to Burton Clark, 1983 there is not a single major social entity which does not have a symbolic side known as a culture and a social structure; Shared accounts/common beliefs help members of the organizations define who they are, what they are, what they are dealing with and the culture is the factor which actually "brings individuals together to share a distinct social fate" (Clark 1983:72). External QA agencies can be no exceptions. They represent one of many types of the organizations existing in the HE field having their own values, norms and belief systems. Therefore, it is interesting to explore what the culture of the agency is in respect to students' inclusion and if this aspect has been an integral part of agency's culture: a tradition/previous practice or recently imposed regulation encouraged by global trends occurring in EHEA. As students' role and voice have gained prominence only recently, it should not be hard to predict that students' participation has been introduced as a new regulation to many agencies' cultures and therefore have placed an obligation on them to comply with this new requirement. According to Amitai Etzioni (1975) there are three main forms of compliance in organized systems: the *coercive*, the *instrumental* and the *normative*, hence similar forms of compliances will be predictable in the context of agencies while adopting the ESG. Although the nature of compliance within agencies is likely to vary due to their past and current experiences/practices of students' involvement and due to their perceptions on the significance of students' role/voice. Throughout my research I will indentify which one of these three types of compliances have occurred in different European QA Agencies while adopting the ESG's criterion on students' participation and explore if common attachment to perspectives, ideas, symbols have prevailed over forced compliance and monetary rewards within agencies' cultures. For understanding beliefs and self-defining ideas generated within each agency, I need to disaggregate its internal culture. In this way I can analyze (a) how internal beliefs interpret outside trademarks, (b) how they mediate between other parts of society/HE, (c) what happens within the black box of each agency and (d) if it simply gives automatic/passive response to absolute external force (The ESG's requirement on students' involvement) without letting this requirement affect its internal

culture and operation. Exploring internal culture and attitude towards students' participation, I could conclude how significant their role is within each agency and what the prospects for their future involvement are. "In each field there is a way of life into which new members are gradually inducted" (Clark 1983:76), therefore if there has been no previous practice of students' representation on external panel, once introduced to the panel the new recruits (students) could be regarded with less authority and legitimacy, but as a matter of fact they will become gradually blended into the community of experts and gain more legitimacy especially if supporting mechanism encouraging their involvement are put in place within the Agency's structure. At the very initial stage students will be required to put a lot of efforts to become adjusted to the internal environment, as they will be entering different cultural houses (meaning external QA agencies) and will need to demonstrate their appropriateness to become naturally integrated into the community. In order to comprehend different QA agencies' culture/symbols it is also worthwhile to take into account their organizational scale (smaller units usually more capable of forging unifying ideologies); organizational age; organizational struggle (if dramatic transformations are taking place) and competitiveness of the larger organizational setting (for survival and status); Knowledge about those factors is essential, as they could cause variations in agencies' responses to external demands and circumstances. Nowadays external QA agencies have to move through hard times and need to possess strong and diverse abilities to survive and sustain legitimacy in a competitive environment. For instance availability of a strong belief system within the agency could ensure its survival/legitimacy and members' depth of belief in the value of the agency could make a difference in response to external demands. Agencies with strong self-belief are in fact more likely to stay united, become even stronger through troublesome times and powerful organizational beliefs could serve as bridges to the outside world across which resources flow. Also agencies deeply believing in themselves are more likely to possess a small social base of believers on the outside world and have a better advantage in raising funds and attracting clientele and personnel, therefore will be less dependent/less imposed to external obligations. The belief usually stands as the reputation and the self-image of the agency; good reputation is very essential for every agency as according to it resources are allocated, hence each agency is enforced to do its best to obtain and sustain a good reputation in its environment. Agencies similar to other institutions are inclined to protect themselves against sudden changes in environment, which could subsequently make their operations outdated and lacking adaptability to environmental changes. An imposed change can be frequently

perceived as a suggestion to make a shift in commitment and therefore be avoided by institutions; frequently the strong self-love of agencies could also rigidify responses, they could appear to be full of pride about their accomplishments/capacities and perceive the shift to new duties as wrenching and impossible. Hence agencies themselves need to acknowledge that there is the need to transform from one craft to another one, otherwise they will not commit themselves to externally imposed regulation and restrain themselves from the change. But compulsory changes are not always reacted by avoidance from every agency justified by the fact that some agencies are more inclined to stay open to experimentation and structural changes than the others ones (Clark 1983).

As nowadays agencies have many publics, they need internal diversity to relate more easily to the outside world and remain responsive to various stakeholders. The cultural fragmentation brought by internal diversity usually leads to further structural fragmentation within the organization, but fortunately availability of some symbolic unity of the whole pulling fragmented units of the organization back together eradicates such fragmentations. As the agency grows, “subculturing around major roles grows apace setting its members’ worlds further apart and developing further differences within each” (Clark 1983:87), therefore to eliminate separation/diversification among members appropriate measures should be put in practice to unite them and ensure equipping them with equal rights, power and legitimacy. If any group (for instance students within the agency) is regarded as a separate and alien segment within the agency, then the symbolic separateness between this group and other agency members starts growing, hence if the agency wants to eliminate the growth of symbolic separateness between its members, it should put more efforts in integrating an alienated group eagerly into its internal culture/structure and start acknowledging it not as a separate group within the community, but as an integral and inseparable one. Special self-interests should be developed to create and spread certain official ideologies for all members of the agency to make them hold the agency together and give its members “a sense of unified mission” (Clark 1983:101). When the agency has to struggle for survival, viability, and standing it has to emphasize the need for obtaining some common commitment from all its members and ensure it appears to outside world as a single entity. Central administration of the agency should make close ties among autonomy-straining units/members and at the multi-enterprise level, the reputation of other QA agencies could act as an essential factor for integration of all European external QA agencies. The sharper the prestige hierarchy of agencies is, the greater the ability of leading agencies is to influence the symbolic dominance

of their styles and traditions over less prestigious ones. Divergent institutions are likely to move towards a common viewpoint, while “the less prestigious ones consciously and unconsciously imitate their betters” (Clark 1983:104). Therefore if prestigious external QA agencies have well developed practices of students’ participation and are actively promoting their inclusion, one can expect less prestigious agencies to start imitating them. Voluntary convergence or mandated similarities along the symbolic/technical sides of agencies is also predictable, but some agencies could refrain from such convergence because they remain fixed in their niches and are unwilling to change. At national/supranational level special groups work together to nurture common pride and loyalty to the unified and national wide objectives (the ESG, The Bologna Declaration, etc), create common definitions of Quality, promote common symbolic systems/general beliefs around QA issues and all these activities are meant to facilitate the integration of different national academic systems. Shared values are not meant to produce similar behaviors to become integrative; while acting differently, based on individual judgments and dictates, they are likely to prompt the shared moral base for actions, shared attachment to the premises, exchange respect, and grant authority accordingly. Institutions as a matter of fact are prone to put a premium on creative divergence (Clark 1983).

In order to predict what resonance the specific change (for instance the ESG’ requirement on the students’ inclusion at the agency level) could bring, I will once again refer to the existing values/belief systems in the HE field and in the agency’s context, as according to Max Weber (1946: 280) “beliefs act like switchmen, helping to determine the tracks along which action will be propelled by interests” (In Clark 1983:99). Those beliefs held within each agency are capable to mediate external pressures. Steered by own ideas, the agencies will interpret the meaning of the societal trends (treating students as equal members of the panel, integrating them into the community of the agency, regarding students’ feedback as valuable, etc.) and decide which responses would appear appropriate to take. Even though all European QA agencies are required to comply with one and the same standards, they still produce diversified responses to common trends and forces due to their different perceptions and beliefs on students’ voice and role. The only way to grasp the relation of external events to internal operations is to comprehend the way those beliefs intervene to give the external a particular form and relevance. If a natural interest in quality as a common responsibility of all members is provoked, it could push the belief on inevitability of students’ role in QA to the forefront/reinterpret its value and make the key actors acknowledge that it is the right time for

this specific idea/modification to happen in the Quality Culture. But rather than exploring only the cultural aspects existing within each agency, it is also worthwhile to take into consideration the environment in which the agency operates (for instance existing academic beliefs and national traditions in HE applicable to the context of a specific country). For example, the loyalty to the state has much greater weight in decisions making processes of some countries than in others, therefore agencies operating in such states would be more inclined to demonstrate their loyalty to the ESG's requirements, as they are imposed externally and from the top (e.g. Germany, GB).

Usually it is not hard to observe the values expressed by powerful groups as they act out their interests in and around the system. In my research I could regard ENQA as a powerful group assessing different European QA agencies' compliance with the ESG. Even cross-national comparisons enable me to spot basic values and underlying issues that main actors in QA field of HE face in common across various European countries, but as they operate in their own local and contextual grounds, they dictate dissimilar responses to similar issues/beliefs. Due to their local contexts different agencies are inclined to understate a particular value, ignore certain primary values in QA culture, focus on other ones, respond differently to a wide set of demands and carve out different niches. Any QA agency, just like other major enterprise, can represent a compromise of conflicting values, which could "press behaviors in contradictory directions and encourage antithetical forms and procedures" (Clark 1983:252), therefore members of the agency should try to reconcile those contradicting values and work for unified objectives. In most cases the ones in power "send down guidelines from the top, but the levers of basic change remain remote, if not hidden completely, which causes those guidelines lose their credibility and efficiency" (Clark 1983:256). Hence, it is important to note that in spite of the fact "how precisely governmental officials attempt to define objectives, the outcome still largely depend upon the cooperation of those in the system"(Clark 1983:261). Thus, in order to ensure their effectiveness over a long period of time, more focus should be placed on proposing a broader direction of development. Every system aiming to interpret, embody and implement wide range of contradictory values should set modest expectations on the possible realization of any single goal/objective, as "modest expectations are an accommodation to this ambivalence of situation and response" (Clark 1983:262). Such realistic hope is mostly likely to go hand in hand with the growing uncertainty which is attached to the policy and action. Hence, I will conclude this section by saying that no matter how strongly the ESG are promoted externally or from the top, its

implementation is to take place at the agencies level, therefore if agencies do not demonstrate any signs of engagement and interest in the adoption of the ESG, those requirements will lose their credibility and become ineffective (Clark, 1983). Hence, norms, values and beliefs existing within agencies matter and are worth considering when analyzing their operations

2.2 Student Involvement in QA: Compliance to External Demands?

Students' involvement in QA is becoming a widespread practice for all external QA agencies among member states of Bologna Process/EHEA and even those institutions with no student representatives in their internal and external QA activities are planning their engagement in the nearest future. In spite of the fact that the intensity of students' involvement in QA greatly varies among European countries, still there is a general tendency of acknowledgement of the necessity and inevitability for more dynamic students' involvement in QA activities on every level of HE. This prevalent trend can be explained through the theory of *new institutionalism* according to which institutions function in an environment consisting of other institutions known as the institutional environment. Individual QA agencies can be perceived as the constituent of the community of European external QA agencies functioning in EHEA, every single agency being affected by the broader environment of European QA agencies. The main aim of every institution is to survive in the competitive environment, which can only be ensured/ achieved if it succeeds economically and establishes its legitimacy within the world of QA agencies operating throughout Europe. Individuals functioning within organizations are influenced by institutions, but instead of acting under regulations or on the ground of obligation, they usually act on the ground of their own conceptions. They realize that in order to survive, they need to make choices/meet external requirements/comply, but "compliance occurs in many circumstances because other types of behavior are inconceivable, routines are followed because they are taken for granted as "the way we do these things" (Scott 2001:57). The Cognitive element of *new institutionalism* suggests that individuals make certain choices because they can conceive no other alternative and not because they fear punishment/attempt to conform/perceive this as an appropriate action or feel the need for social obligation. "Logic of appropriateness" guides the behavior of actors within an institution and the norms and formal rules of institutions shape the actions of those acting within them (Gornitzka 1999).

Student involvement in QA promoted by the ESG could not be understood without exploring the institutional/national contexts in which QA regulations take place. To fully comprehend how students' participation is perceived through the external evaluations it is essential to explore the level of legitimacy of students' participation vis-à-vis assessed institutions/academics and peers in internal/external QA teams. Judging from agencies' perspective, students' inclusion defined by the ESG can be perceived as an imposed

regulation or proposal for change from national/supranational government. Seeing students as equal and key actors in QA activities and decision making bodies is still problematic in some countries' HE context and explanations for such obstacles can be looked for in internal dynamics of HE and QA agencies. Permitting students' engagement in QA activities and decision making bodies could be perceived by some agencies as a ground or for others even as a threat for organizational change (prompting redistribution of power within it), which could take the nature of perfect flexibility or perfect inertia from agencies' side as a response. According to the neo-institutional perspectives "organizational choice and action are limited by various external pressures and demands, and the organizations must be responsive in order to survive" (Gornitzka 1999:3). As the ESG underlines the necessity of student involvement in external QA activities and as agencies are dependent on external evaluation outcomes for proving their legitimacy/recognition and attracting further financial investments, they are obliged to accept/comply with students' presence in external review panels, though the level of acceptance could still vary from one institution to another stemming from its internal structure/characteristics and students' position/reputation within academic community of the specific country. When attempting to understand agencies' compliance to external demands, I need to take into consideration the fact that they are capable of handling and manipulating their dependence in various ways. If I want to comprehend how agencies' contexts affect their actions then I need to explore how they learn about their environment and how they attend to it, in what ways they choose and process information to assign meaning to their environments. According to the new-institutional theory "organizations operate in an environment dominated by rules, requirements, understanding, and taken-for-granted assumptions about what constitutes appropriate or acceptable organizational forms and behaviors" (Gornitzka 1999: 6); having said that I can bring in the ESG's criterion on student involvement as an already established and acceptable organizational norm/behavior dominating in the environment of European QA agencies; some agencies comply with requirements prevailing in their environment in order to survive and demonstrate their responsiveness, while others combine "conformity to environmental expectations with organizational stability" (Gornitzka 1999:5). "Often deliberate attempts at organizational change are frustrated by organizational resistance, whereas most changes in organizations are the results of relatively stable routine responses that relate organizations to their environments" (March 1988). Although the ESG do not appear as predetermined regulations/conditions to be implemented step by step with too many prescriptions, they encourage all EU countries to handle their QA activities in

accordance to them as the pre-requisite for becoming an acknowledged member of ENQA community. Level of acceptability of change in organizational structure (implying students' inclusions in the agencies' external assessment panels) greatly depends on how matching this intention is to agencies' identity and internal culture; in case of a good match the agency will react to this change with non-upsetting manner. In order to guarantee achieving the success in major reformation attempts for change it is essential to ensure that there is "a normative match and congruence between the values and beliefs underlying a proposed programme or policy and the identity and traditions of the organization" (Gornitzka 1999: 6). Some agencies can react collectively to legal requirements proposed by the top authority or react individually "ranging from passive acquiescing to active manipulation of external demands" (Oliver 1991, Heine 1998). In order to understand how much acceptance students' engagement will obtain within each external QA agency, it will be necessary and helpful to understand internal processes and grounds/opportunities for students' activism. Cultural identities, features and previous practices of students' inclusion in agencies' QA activities should be taken into account as the ground for understanding students' past, current and predictable future role and function within the agency.

Sufficient attention should be also given to the agencies' role in the ESG's implementation and feedback, as active participation/engagement can negotiate and create better environment for the implementation procedures. Usually the level of change implied by the policy has consequences on its implementation conditions, "more a policy departs from the existing behaviors and procedures, the more resistance it will encounter when implemented and the more it will be affected by the tendency to transform a reform back towards the established order" (Gornitzka 1999:14). Therefore it is essential to ensure that there is a normative match between a specific government initiative and the values and identities of agencies a policy is targeted at. A new-institutional perspective emphasizes that "institutions provide a temporal order in political life and the content and implementation of policies and reforms are influenced by the institutional and historical context within which policies and programmes are positioned" (March and Olsen 1984/89); it also directs attention to the cognitive and normative elements in the environment shaping organizational action; Therefore will be applied to my research to analyze how agencies change in accordance to environmental expectations and how much influence they experience by their wider environment dominated by taken for granted values, norms and beliefs.

2.3 An Integrative Analytical Framework of Student Participation in QA

As I intend to explore to what extent European QA agencies are adapting to the requirement of including students in external review of HEIs, explain which factors cause variations among European QA agencies in students' inclusion and as the interest level for my research remains mainly on organizational/agency level, I decided to apply the *New Institutional theory* to my theoretical framework. The ascendance of the institutional theory is a continuation and extension of the intellectual revolution which began during the mid 1960s and introduced conceptions of open systems into the study of organizations. Open systems insist on the significance of the wider context or environment as it constrains, shapes, penetrates, and renews the organization (Katz and Kahn 1966). Initially organizations were conceived as instrumental production system (only transforming inputs into outputs), but subsequently they were envisioned as social and cultural systems. According to Richard Scott (2001) the neo institutional approaches in sociology build on a loosely constructed framework of ideas stemming from cognitive psychology, cultural studies, phenomenology, and ethnomethodology. It emphasizes dominance of cognitive over normative frameworks and focuses primary attention on the effects of cultural belief systems operating in the environments of organizations rather than on intra-organizational processes. As I intend to analyze not only a single QA agency, but the continuum of European QA agencies representing a wider open system of organizations, it will be interesting to scrutinize the environment in which they currently operate, observe in what ways it exercises the influence on their operations and how it penetrates into internal cultures of agencies. One more reason for choosing this specific theory is that it provides a fruitful perspective which can help me find out, comprehend and also counteract the stumbling blocks that may arise while implementing a new QA measure/requirement on the agency level; Throughout my research I intend to perceive the ESG's requirement on students' inclusion as something innovative prompting the consequent change in agency's internal culture and structure; The reason why I introduce students' inclusion in QA activities as an innovation requiring some structural adjustments from agencies' side is that it has not been too long ever since students gained the power in expressing their opinions freely and became influential members of the expert panel. By applying the new institutional theory' perspective to my research, I will manage to analyze how agencies, once confronted with the demand for change, interpret it in the light of "the

established logic of appropriateness”. Understanding “logic of appropriateness” is essential for my research, as if agencies apply different logic of appropriateness in respect to the requirement on students’ inclusion they are likely to respond in different ways (Scott 2001).

Institutional theory can explain why QA agencies located in widely scattered locales (all around Europe) resemble each other so closely, why they follow the similar tracks of development and identify the nature of their choice while adopting the ESG’s criterion on students’ involvement: whether it has been “the pursuit of rational interests, the exercise of conscious choice or this behavior has been shaped by conventions, routines and habits” dominating in current EHEA (Scott 2001: XIX). Cultural belief system, formal structures and informal rules/procedures existing within the agency shape its nature, operation and conduct, hence, knowledge about those characteristics will assist me to justify/understand its operation. As I aspire not only to discover to what extent students participate in agencies’ activities, but also to analyze on what grounds the agencies comply with this requirement, I once again refer to the new institutional theory, which is good at explaining the nature of conformity: if it was prompted by anticipation of reward for such action, if agencies felt morally obliged to obey to this particular requirement or if they could conceive no alternative way of behavior in this particular situation. The fact that each agency represents “adaptive organic system affected by the social characteristics of its participants, as well as by the varied pressures imposed by its environment” (Selznick 1948: 25) does not guarantee its mechanical response to externally imposed stimuli, every agency is prone to initially interpret those stimuli and only consequently shape its response. Every agency similar to other institution is likely to become infused with the value (embodying a distinctive set of values) and acquire its unique character (structure, a distinctive identity) and start struggling to preserve its own set of unique values (Scott 2001).

Need for Survival/ Reasons to Comply:

Every agency just like any other organization is forced to struggle for its survival in a competitive environment. In order to survive agencies need to demonstrate their capacity to replicate and alter their routines in the face of changing conditions. Although the operation in the same environment cannot guarantee agencies the same forecasts for survival, their specific location in the relational/cultural system matters greatly for their survival prospects (DiMaggio 1986).

Even though all European QA agencies are imposed to one and the same requirements and guidelines, how can the detected variations in their behaviors, responses, practices be explained and justified? Behavior is usually shaped “not only by attention to rules and the operations of norms, but also by common definitions of the situation and strategies of action” (Durkheim and Parsons 1935; In, Scott 2001: 39). Therefore it is unrealistic to claim that all agencies will give analogous definition to the same issue, make similar strategies of action and behave in a comparable way. Agencies operating in the similar situation, could still identify the situation quite differently, both in terms of what it is and what ought to be instead, which could unquestionably lead to their diversified responses to similar issues. But no matter how differently agencies respond, they still need to comply with their environment/external demands and apply one of the mechanisms to circulate external effects locally. DiMaggio and Powell (1983) distinguished three important mechanisms: *coercive*, *mimetic*, and *normative* by which institutional effects are disseminated through a field of organizations. Therefore in the subsequent section I plan to analyze which one of these mechanisms has been applied by each agency while responding/implementing the ESG’s requirement on students’ inclusion.

Reasons why agencies comply with the ESG could be ranging from taking ESG’s implementation for granted as the only appropriate way to follow, believing that such behavior would result in normative approbation to merely complying with it as it is required by legal/rule-like frameworks. Various internal and external factors prompt diversified nature of organizational responses to externally imposed regulations: some can react strategically and some simply defend themselves from forced pressures. According to Weber (1968:31) actions are usually guided by a belief in the existence of a legitimate order, a set of “determinable maxims” providing models viewed by the actor as “in some way obligatory or exemplary for him”. As it is essential for organizations to remain legitimate and the only possible way to sustain legitimacy is to stay “in conformity with rational prescriptions and legal or law-like frameworks, they are constantly under normative pressure to ensure that their goals are congruent with wider societal values” (Parsons 1956/1960, In, Scott 2001:152). According to Meyer and Rowan (1977: 352) “independent of their productive efficiency, organizations which exist in highly elaborated institutional environments and succeed in becoming isomorphic with these environments gain the legitimacy and resources needed to survive”, thus for QA agencies to stay legitimate and in hold of inevitable resources they need to comply with environmental requirements constantly and become isomorphic with their environment once needed. As it is of a great concern for agencies to remain functional, they

are constantly under pressure to assume the form best adapted for survival in particular environment or acquire a form regarded as legitimate in their given institutional environment; for the same purpose agencies are obliged to demonstrate structural features that make them both recognizable and in conformity with normative and regulative requirements. Usually “organizations exhibiting culturally approved forms and activities (including strategies), receiving support from normative authorities and having approval from legal bodies are more likely to survive than organizations lacking these evaluations” (Scott 2001:158). Hence if QA agencies want to remain reliable and legitimate, they need to take into account all above mentioned factors.

Responsive Organizations/ Similarities Detected between Agencies:

Usually organizations which operate more closely aligned with the public sector are more likely to be responsive to external pressures, particularly legal and regulatory requirements (Edelman 1992) and their adoption of innovations are also more easily affected by having the tight linkages with other actors in the environment. As European external QA agencies do not function entirely independently from other European agencies, are tightly connected to the public sector, cooperate regularly and actively with other actors of HE, are willing to bring their opinions/perspectives into their operation and stay alert to their needs/expectations, we may argue that they as a matter of fact are more likely to stay responsive to external pressures, than other types of organizations. As each individual QA agency is the constituent of the community of European external QA agencies functioning in the EHEA the concerted responses by multiple similar organizations might have “the potential to shape the nature of the demands and even to define the rules and logics operating within the field (Scott 2001:176). In processes in which rules and normative controls are proposed or legislated, interpretations and collective sense-making activities take place among participants in the field to which they are directed and then the redefined and clarified requirements become more often the rule rather than the exception. Thus norms and standards established after collective sense-making activities become applicable to all European QA agencies and are expected to be followed and adopted by them.

We are already aware of the fact that agencies are effected by their broader environment; as they stay in frequent interaction with similar organizations and are subjected to the same environmental conditions, they could even acquire similar form of organization. Could above mentioned factors explain observed similarities and imitation among various European QA

agencies while adopting the ESG? If we refer to the relevant literature to find answers to the proposed question, we discover that organizations as a matter of fact are prone to imitate the behavior of organizations that are perceived to be similar to themselves (Palmer et al. 1993), especially those which have high status, prestige (Burns and Wholey 1993) and are perceived more visibly successful (Haveman 1993, Kraatz 1998). Hence, it should not be surprising to detect attempts by less influential and less acknowledged agencies to imitate more prestigious ones. Also widely held cultural beliefs operating at the world-system level are likely to provide much structure and support to comparability of QA systems among European countries and account for much of the uniformity and coherence within this field (Meyer 1977). Frequently we encounter that reformers try to simply imitate and import successful practices from other societies and they underestimate the fact that much inventiveness is required to fit those models into their particular contexts and circumstances.

If we perceive the ESG as an externally imposed regulation/requirement on the agency, how can we explain the ways agencies participate and respond to those regulatory efforts? It is well known that “laws and regulations are socially interpreted and find their force and meaning in interactions between regulators and the regulated (Scott 2001:169), thus, organizations do not simply accept/follow regulations tossed from the top level (from regulators), but they themselves “define and set limits on their appropriate ways of acting, including actions taken in response to external pressures” (Scott 2001:171); strategies how to respond or continue functioning are still institutionally shaped and not externally imposed/prescribed. According to Oliver (1991), once confronted by external pressures individual organizations may apply various strategies including:

- ***Acquiescence (conformity)***, which necessitates either imitation of other similar organizations as models or compliance to the perceived demands of cultural, normative or regulative authorities and is usually prompted by anticipation of enhanced legitimacy, fear of negative sanctions, or hope for obtaining additional resources
- ***Compromise strategy***: organizations balance, placate and negotiate institutional demands
- ***Avoidance strategy***: organizations buffer some parts of organizations from the necessity of conforming to the requirement

- ***Defiance strategy:*** organization resists to pressures in a public way which usually occurs when norms and interests of focal organizations diverge substantially from those attempting to impose requirement on them
- ***Manipulation:*** organizations apply the purposeful and opportunistic attempt to co-opt, influence, or control the environment and defend themselves by developing linkages with important sources of power (Oliver 1991: 152-157).

Having listed the commonly taken strategies by organizations in response to external pressures, I intend to apply them in the context of external QA agencies in the subsequent section; after presenting the information about each agency, I plan to use above mentioned framework and foresee which specific strategy the agency has applied while implementing the ESG's criterion on students inclusion on the assessment panel.

Three Pillars of Institutions

In order to understand how each external QA agency is responding to the specific requirement set by the ESG, it is essential to explore what types of institutional beliefs and rules have supported the development of the agency to its current state and what the ground for the compliance to a new requirement could be.

Before making assumptions how much acceptance a new requirement/change will obtain within the organization, it is essential to understand what the structure and the culture of the organization are. Quality agencies similar to other organizations are “social structures that have attained a high degree of resilience, are composed of cultural-cognitive, normative, and regulative elements that, together with associated activities and resources, provide stability and meaning to social life” (Scott 2000:48). They can be regarded as multifaceted, durable social structures, made up of symbolic elements, social activities, and material resources. By demonstrating their idiosyncratic properties they appear relatively resistant to change (Jepperson 1991), are transmitted, maintained and reproduced across generations (Zucker 1977). Institutions usually expose above mentioned properties due to the processes set in motion by regulative, normative, and cultural-cognitive elements. Those elements are “the building blocks of institutional structure and provide the elastic fibers ensuring resistance to change” (Scott 2000:49). Institutions are capable of “imposing restrictions by defining legal, moral and cultural boundaries, setting of legitimate from illegitimate activities”, but they are

also capable of supporting and empowering activities and actors, providing guidelines and resources for acting as well as putting prohibitions and constraints on action (Scott 2002:50).

Regulative systems, normative systems, cultural-cognitive systems are vital ingredients and pillars for making up/supporting institutions. Those elements “form a continuum moving from the conscious to the unconscious, from the legally enforced to the taken for granted” (Hoffman 1997: 36). The reason for introducing three pillars of intuitions is that I intend to classify European external QA agencies in accordance to them and identify which system has prevailed in the context of a particular agency; the classification of agencies will be made on the basis of their compliance/order, mechanisms, logic and indicators applied while implementing the ESG’s requirement on students’ participation in external panels.

Table 1: Three Pillars of the Organization

Pillars			
	Regulative	Normative	Cultural-Cognitive
Basis of Compliance	Expedience	Social Obligation	Taken-for-grantedness Shared understanding
Basis of Order	Regulative Rules	Binding Expectations	Constitutive schema
Mechanisms	Coercive	Normative	Mimetic
Logic	Instrumentality	Appropriateness	Orthodoxy
Indicators	Rules, Laws, Sanctions	Certification, Accreditation	Common beliefs Shared logics of action
Basis of Legitimacy	Legally Sanctioned	Morally Governed	Comprehensible, recognizable, culturally supported

Source: Adapted from R. Scott 2001: pp 52

I will shortly summarize what each pillar stands for within the institution to alleviate the understanding why and to what extent they have been applied to external QA agencies’ context in the subsequent section.

The Regulative Pillar: Institutions are capable to constrain and regularize their behaviors. Regulatory processes establish rules, observe others’ conformity to them and manipulate sanctions, rewards or punishments in an attempt to influence future behavior. Organizations conforming to the rules are pursuing their interests, but the primary mechanism of control is

still coercion (DiMaggio and Powell, 1983). Force, fear, and expedience make the central ingredients of the regulatory pillars. Authorities do not base their regime solely/ultimately on force, but also attempt to cultivate a belief for its legitimacy. There are some cases when rules are imposed on others by using threats and sanctions, but incentives are as well provided to ensure the compliance. For guaranteeing rules' acceptability, they have to be easily interpretable/ dispute-resolved and supported with adequate incentives and sanctions for easier implementation procedures, as the conformity is one of many possible reactions (Scott 2001).

The Normative Pillar: “Normative rules introduce prescriptive, evaluative, and obligatory dimensions into social life. Normative systems comprise of values (conceptions of the preferred or the desirable, together with the construction of standards to which existing structures and behavior can be compared and assessed) and norms (how things should be done defining legitimate means to pursue valued ends)” (Scott 2002: 54-55). Normative systems identify goals and objectives and allocate proper ways to pursue them. Some values/norms are applicable to all members of the community, but some apply only to the selected types of actors/positions, which usually lead to the rise of roles: “conceptions of appropriate goals and activities for particular individuals or specifying social positions”. Those beliefs are not merely “anticipations or predictions, but prescriptions - normative expectations, which define how actors are supposed to behave and much of the behavior in an organization is specified by standard operating procedure “ (March and Olsen 1989:21).

The Cultural-Cognitive Pillar: Cultural-cognitive elements of institutions are the shared conceptions that compose the nature of social reality and the frames through which meaning is made. To comprehend or explain any action, it is essential to take into consideration not only objective conditions but also the actors' subjective interpretation of them. “Internal interpretive processes are usually shaped by external cultural frameworks” (Scott 2001:57). According to cultural-cognitive theory compliance takes place in various circumstances as other type of behavior are inconceivable, routines are followed because they are taken for granted as “the way we do these things”. Meyer and Rowan (1977) and DiMaggio and Powell (1983) have emphasized the extent to which wider belief systems and cultural frames are imposed on or adopted by individual actors and organizations. A cultural-cognitive conception of institutions emphasizes the central role played by the socially mediated construction of a common framework of meaning.

Every organization needs to possess not only material resources and technical information, but social acceptability and credibility as well in order to survive and thrive in their social environment (Scott *et al.* 2000). Above mentioned pillars offer a basis for legitimacy: “a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed systems of norms, values, beliefs, and definitions” (Suchman 1995b: 574). According to the new institutional perspective “legitimacy is not a commodity to be possessed or exchanged, but a condition reflecting perceived consonance with relevant rules and laws, normative support, or alignment with cultural-cognitive framework and is a symbolic value to be displayed in a manner such that it is visible to outsiders” (Scott 1998: 211).

Three pillars elicit three related but distinguishable bases of legitimacy, the regulatory emphasis is on conformity to rules; a normative conception stresses a deeper, morale base for assessing legitimacy (normative controls to be more internalized and include intrinsic and extrinsic rewards for conformity); a cultural-cognitive view “stresses the legitimacy that comes from adopting a common frame of reference or definition of the situation and seeks the legitimacy from cognitive consistency” (Scott 2002: 61).

Organizational identity provides participants with a core set of normative and cultural-cognitive elements around which to craft their narrative and sense-making activities (Albert and Whetten 1985; Whetten and Godfrey 1998) and “the activity itself creates stimuli that direct attention towards its continuance and completion” (Simon, 1945:106). Hence, if students’ inclusion has been encouraged by normative or cultural-cognitive elements of the agency, its participants would have nothing against including students into their activities and supporting mechanism of organizational normative and cognitive norms would continue encouragement of their further engagement.

Different theorists give different significance to the existing factors within the organization. Cultural-cognitive theorists tend to emphasize the important role played by unconscious, taken-for-granted assumptions which define social realities; regulatory theorists stress conscious control efforts: actors employing power not just for creating institutions, but also preserving and maintaining them over time (Stinchcombe 1968, DiMaggio 1988). Thus, it is important to devise appropriate governance structures and develop incentives and controls suited to the situation (Pratt and Zeckhauser 1985). Once regulation is institutionalized the

rewarding and sanctioning could take place within a framework of rules and power and be regarded as stabilized and legitimized.

“Organizations actively participate in the meaning of compliance” (Erlanger 1999: 407), but they also acknowledge the fact that they need to stay responsive to external requirements in order to sustain their legitimacy and functionality. They realize that if they lack the accreditation they could be regarded as suspect and may not be eligible for reimbursement from certain funding sources. Norms governing organizations usually arise incrementally and informally, but actors not taking appropriate actions could be regarded as negligent in the protection of internationally accepted expectations, therefore they are still enforced to take those factors into consideration while forming their organizational norms (Scott 2001).

By classifying European QA agencies according to 3 pillars of organizations, it will be easier to predict which mechanism: *coercive*, *normative*, and *mimetic* they have applied while adopting the ESG' requirement on students' inclusion. Those mechanisms are usually good at identifying various forces or motives for adopting new structures and behaviors. The coercive, mimetic, and normative pressures sometimes encourage isomorphism among structures of agencies; due to the fact that they function in the similar field they have to compete, cooperate, learn from each other and sometimes even pursue similar types of reforms.

Regulation being coercive by nature will gain no efficiency if not demonstrating clear demands and empowering effective surveillance and adequate sanctions. Though regulatory activities are thought to embody coercive pressures they still depend more on normative and cognitive elements (Scott 2001:117). Usually “professionals exercise their control via cultural-cognitive and normative processes and exercise control by defining realities, devising ontological frameworks, proposing distinction, creating typifications, and fabricating principles or guidelines for action. Hence, they rule by controlling belief systems and their primary weapon is ideas” (Scott and Backman 1990: 290).

Attention devoted to globalization, the trends towards increased interdependence and the development of associations/movements with transnational agendas have encouraged uniting various actors and giving them possibility to exercise normative and regulative authority collectively. According to macrophenomenological framework (Meyer *et al.* 1977) the collective actors are themselves products and serve as carriers of broader, worldwide cultural frameworks supporting rationalization activities of many types; As a result it should not be

surprising to observe wide acceptance and encouragement of the ESG at each level of HE brought by the global tendencies around comparability of European QA systems and sharing the best practices among various European QA agencies. Actors present at different levels of HE (agency, national, supranational) are all imposed to worldwide cultural framework defined for European QA and are encouraged to dedicate themselves to unified objectives. After bringing transitional agendas to the forefront of our attention, we should not overlook the structuration factor existing in the environment of European QA agencies, as it assesses/analyzes interaction among organizations functioning in the similar field. Under globally accepted perceptions “interorganizational structures of domination and patterns of coalition” are emerged and “mutual awareness among participants in a set of organizations that are involved in a common enterprise” is developed (Scott 2001:141). Nowadays there is considerable evidence of increasing structuration among organizations: “agreement on the institutional logics guiding activities within the field, increased isomorphism of structural forms within populations in the field, increased structural equivalence of organizational sets within the field” (Scott 2001:143). Hence, structuration effect could also be applied to the QA agencies’ context and used as an explanation for detected similarities among them.

“The seeds of change are lodged both within and outside of institutions” (Scott 2001:203). Wider environmental conditions can shift rendering current institutions vulnerable to abrupt changes. One imposed with unified rules and regulations some organizations are likely to react in a superficial way, when others in more in-depth-way. Various types of responses can be directed to one and the same requirements ranging from isomorphic adoption to hostile defiance strategy: some agencies are likely to respond to external pressures by adopting new structures or practices through the formation and diffusion of new forms/elements; while others becoming locked in and resisting subsequent improvement due to historical actions of the organization generating path dependent forms. “In some cases changes in rules are based on collective mobilization and conflict, in many organized systems, formal structures are in place to support routine reviews of and revisions in rule systems. The creation of such formalized decision-making and governance systems serves to institutionalize the process of institutional change” (Scott 2001:197).

Having presented the theoretical framework for my research question, I will move on to introducing the empirical data derived from ENQA reports created after the assessment of external QA agencies’ compliance with the ESG in the subsequent chapter.

3 Empirical Results

3.1 Data and Methods

Before moving to the overview of applied data and methods for my research it is necessary to point to a number of facts about ENQA member agencies. Overall, there are twenty-five countries represented in the ENQA community: Austria, Belgium, Bulgaria, Cyprus, The Czech Republic, Denmark, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, The Netherlands, Norway, Poland, Romania, Russia, The Slovak Republic, Spain, Sweden, Switzerland, UK; But as some countries have more than one QA agency represented for ENQA membership, their total number adds up to forty-five. Therefore there are forty-five full member agencies and three candidate agencies Belgium AEQES - Agence pour l'Evaluation de la Qualité de l'Enseignement Supérieur organisé ou subventionné par la Communauté française, Lithuania SKVC - Centre for Quality Assessment in Higher Education, ECCE - The European Council on Chiropractic Education in ENQA community. So far ENQA has reviewed thirty-four QA agencies and has presented its external evaluation reports on its web-page under the section of the latest publications of ENQA reviewed reports and decisions. Currently ENQA is undertaking two external reviews: the European Council on Chiropractic Education (ECCE) and the Finnish Higher Education Evaluation Council (FINHEEC), the final reports of the above mentioned agencies are not yet available (ENQA 2010). As a result in this section I present the empirical data derived from the above mentioned thirty-four reports. ENQA has appointed expert panels to undertake reviews of those European QA Agencies and the intention of external reviews was to verify to what extent the agencies had met the criteria for the full membership of ENQA, identify the level of compliance with the ESG and provide adequate recommendations in case of discrepancies. ENQA recognizes the importance of having well prepared experts for the agencies' external reviews and provides the training sessions to ensure that experts "undertake review even more rigorously, fairly, transparently and consistently" (ENQA 2010: 10). The purpose for the training sessions organized by ENQA is to equip experts with the necessary knowledge and guidance on the interpretation of the ENQA membership criteria/ESG. Only after attending above-mentioned sessions experts are appointed to the ENQA trained pool of experts and allowed to participate in the evaluation procedures. Although there is no single ideal model for the composition of a review panel, one key requirement is always identified: ensure panel

members are totally independent of the Agency under review and have an adequate level of knowledge, experience and expertise to conduct the review to a high standard. Due to experts' independent status and possession of a wide range of professional experience of HE and QA, one can assume that they are capable to make reliable, impartial and solid conclusion in the evaluation procedures. The diversity in the composition of the panel (having representatives of HEIs, students and stakeholders).also proofs the availability of different viewpoints into the review process; hence enrich its variety and reliability. Also the fact that the panel included one or two QA experts from outside the national system under review (international member (s)) increases the credibility of the external review reports. As expert panel precisely reviews the documentation provided by the agency (including the self-evaluation documents), validates the self-evaluation through the site visits (verifying the information presented before the site visits and exploring through additional documentation more information relating to the Agency's compliance with the ENQA membership criteria/ESG), discusses its findings with the Board members of the Agency/explains the next steps in the review process and only subsequently reaches conclusions/produces its final report, one could argue that conclusions reached by its members are considerably coherent and trustworthy. Also as every agency is provided with a copy of the external review report and is given sufficient time to identify factual errors or essential misunderstandings in the draft report before publishing its final version, one could suppose that content of the report actually corresponds to the reality existing within the agency. The consistency of the panel's conclusions can also be justified by the fact that the panel is obliged to exercise its judgments in the light of clear evidence and demonstrate the sound reasoning behind each conclusion (presenting evidence, analysis and conclusion for the level of compliance with each ESG's criterion) (ENQA 2010).

As the compliance with the ESG is a prerequisite to obtain full membership of the ENQA community and every external report analyzes agencies' level of conformity with those requirements, I decided to use it as the main data source for my research. But as students' representation on external evaluations of HEIs is just one of several ESG's requirements, the information available on the conformity to this specific criterion is rather limited in each report; therefore in this section I've presented all the information available in the reviewed reports directly relevant to my study. To obtain further relevant information, I referred to the self-evaluation reports drafted by individual agencies and used it as the secondary data for my research. Although I have to note that the most of the information from the self-evaluations

had already been included in external review reports, therefore did not considerably increase its quantity.

While those reports are meant to analyze agencies' compliance with the ESG and represent reliable judgments of the external panel, questions can still be raised about their reliability and applicability of findings to a wider context. Although the information presented in the reports is factual and precise, it remains rather limited and is the outcome of judgments made by a limited number of experts. Therefore, one could argue that it lacks diversity of viewpoints and comprehensiveness. As the primary interest for my research is students and their engagement in agencies' review procedures, it would have been interesting to look at this issue from their point of view. Although the expert panel always includes one student member while assessing QA agencies, it is hard to assume how much freedom/authority the represented student has been given and if she/he has actually managed to exercise any influence on the conclusions made by the expert panel. Hence, one could not claim that the students' viewpoint has been thoroughly demonstrated in the external review report. If the time frame for my research allowed me, I could have taken the following measures to double check and enhance the reliability/validity of the applied data: interview participant students in the expert teams to clarify how actively they managed to engage themselves in the review procedures and to what extent they were able to influence judgments made by the panel; conduct further research/case studies at the local agency level to obtain the information which was missing in the external reports and explore the practices of the student engagement within agencies' activities in its natural setting, also interview students participating in external evaluations of HEIs and hear about their viewpoints concerning their actual role and authority.

For analyzing the reports, I applied the three organizational pillars' framework adopted from Scott and looked for indicators, basis of compliance/ order/ legitimacy, mechanism and logic dominating within agencies' operations while adopting the ESG (e.g. perceiving the student engagement as an *imposed regulation, a well-established practice or preferable action for securing the legitimacy*). Thus, as a conclusion of this section I summarize the table presented in the previous chapter by pointing out those indicators which I have observed in the reports and applied for the basis of the classification.

Table 2: Indicators Applied for Reports' Analysis

	Regulative	Normative	Cultural-Cognitive
Basis of Compliance	Externally Imposed ENQA/ESG	Appropriate performance, recognizing the need for comparability of QA agencies' practices	Voluntary, intrinsic acknowledgement of student inclusion
Basis of Order	Defined through ENQA membership criteria, ESG	Recommended action to fit in the community of credible QA agencies	Shared conceptions, social reality of the Agency
Mechanisms	Coercive	Normative	Mimetic
Logic	Avoid punitive sanctions Obey set regulations	Stay comparable with other trustworthy QA agencies Having expectation for the better future	Strong Beliefs in the benefits brought by student engagement
Indicators	Limited students representation Doubts about student knowledge and expertise	Permitting student participation but with limited responsibilities Students represented as assistants/observers Students produce separate reports	Acknowledging students as equal partners (equipped with full membership and voting rights) Students' solid position in HE community Attempts to enhance students' experience in the panels
Basis of Legitimacy	Legally Sanctioned	Morally Governed	Culturally Supported

Source: the Author, Based on R. Scott, 2001

3.2 Compliance with the ESG in Respect to Students' Inclusion in External Reviews of HEIs According to ENQA External Evaluation

By the end of the 1990s concern for quality and standards had become global and it coincided with HE reforms which were meant to take better account of students' and stakeholders' demands. The 1990s have observed an increasing state interest in quality of outcomes of HE and accountability of HEIs, which led to the establishment of national QA agencies. The tendency for the drastic increase of QA bodies to make a profit from the value of recognition or accreditation label and the impossibility to have power over such enterprises led Europe to recognize the need to take appropriate measures to defend the interests of already established agencies as well as guarantee that the benefits of QA are not diminished by the activities of disreputable practitioners. This has promoted the proposal for the formation of a register. ENQA has committed itself before the Berlin Ministerial meeting of 2003 to develop a European Register of QA agency, which would recognize professional and credible QA agencies functioning in Europe. The most valuable benefit of the register is its informative value to institutions and stakeholders and its ability to become an exceptionally constructive tool for gaining transparency and comparability of external QA of HEIs. The review of external QA agencies consists of a self-evaluation, an independent panel of experts and concluding published report. There is a set of principles that introduce common denominators of good practice while simultaneously acknowledging the internal diversity of agencies in respect to their purposes and historical-cultural contexts. It proposes agencies to submit themselves to a cyclical external review of their activities and processes at no more than five-year interval and guarantees to provide the report documenting the outcomes of the review underling the extent of agencies' compliance with the European standards for external QA agencies. As a result of the peer review agencies are classified in the following categories: European national agencies that have been subjected to the review and comply with all the European standards for external QA agencies; European national agencies that have been subjected to the review and do not comply with all the European standards for external QA agencies; Non-national and extra-European agencies that function in Europe and have been subjected to the review and comply with all the European standards for external QA agencies and non-national and extra-European agencies that function in Europe and have been subjected to the review and comply with all the European standards for external QA agencies.

Compliance with the European standards for external QA agencies is one of the criteria for acceptance to the register, therefore, conformity with it should be strongly reinforced with the agency's culture in order to secure its approval.

As nowadays the quality of HE is evaluated by examining the process through which the student learns (what accomplishments the student has made in learning and what the outcomes of the learning process are) and as students have become concerned about obtaining quality assured education, those factors have brought the need to grant students the authority to have a say in the assessment processes and consult them while developing standards and procedures. As a consequence "student involvement in HE has progressively being endorsed across Europe". (ENQA 2010: Bennett *et al.* 2010: 26). From actions taken in this respect I want to point out the ESG, which have undertaken the challenging initiative to oversee the successful implementation and consistency of QA procedures/requirements in HEIs by promoting the use of common reference points for QA in cross-border HE in addition to the national guidelines which HEIs are subjected to and which have emphasized the shift to student and stakeholder interests (encouraging students' active participation in external reviews of HEIs). But other than the ESG the concept of students' involvement has also been outlined as one of the main principles of the Bologna Process and been eagerly promoted by the European Students' Union and the United Nations Educational, Scientific and Cultural Organization. ENQA requirements have also contemplated students' participation in the external QA processes of its member agencies (ENQA 2010: Bennett *et al.* 2010).

UNESCO and OECD have as well developed a set of guidelines, known as the UNESCO/OECD Guidelines. These guidelines do not aim to overrule the local state's authority to observe whether HEIs are complying with the Bologna Process action lines, but promote cooperation on a European and international scale focusing on the exchange of best academic experiences (students having a central role in QA systems). They anticipate that QA on a national level "will have a spill-over effect on the international level, but strongly support the "Quality Begins at Home" premise (ENQA 2010: Bennett *et al.* 2010: 29). They also believe that the input of students organizations focused on explicit disciplines will be unquestionably constructive and valuable in the broader spectrum of cross-border QA and therefore see the need to strengthen cooperation with regional and continental student organizations to facilitate the exchange of information and promotion of QA in cross-border HE. Both UNESCO and Student bodies are expected to put more pressures on QA agencies to

ensure that quality provision in cross-border education is adequately addressed. But according to the ENQA 2008 survey UNESCO/OECD Guidelines have not gained too much impetus, as only “seven respondents out of fifty-one responding agencies within 30 EHEA countries apply them for their agency’s external quality procedures, 41 of the responding agencies use the agency’s own published criteria and standards, 39 apply the ESG, while 31 employ national criteria and standards for their agency’s external quality procedures” (ENQA 2010: Cassar 2010: 29).

According to Brennan and Shah (2000) every evaluating agency needs to possess a “bureaucratic authority” to carry out its operation efficiently but, as “the specific competence of the agency’s own staff is the administration and conduct of assessment procedures, but their legitimacy does not extend to the performance of the very assessments themselves” (ENQA 2009: Aas *et al.* 2009:11), the agency is required to employ expert peers from academia to take this responsibility but putting them under the patronage of the agency. Most of the agencies have special requirements on the composition of the expert panel, although the most common composition is three HE staff members, one work-life representative and one student. In spite of the set requirement only about half of the agencies use work-life representatives and/or students in their panels although they intend their inclusion in the nearest future. Students are more likely to be found in an audit-panel, there are only few cases when agencies use students in the panels being in charge of conducting institutions evaluation (ENQA 2009: Aas *et al.* 2009).

QA agencies within the EHEA carry out diverse external process for different purposes and in different ways. It is of the primary significance that agencies operate procedures which are suitable for their own defined and published purposes. However, the experience has proved that there are some widely-spread and widely-used elements of external review processes which not only assist to secure their validity, reliability and usefulness, but also provide a basis for the European dimensions to QA. One of these noteworthy elements is the participation of students in external review panels of QA agencies, therefore in this section I will explore how students are represented at external panels, what their role is, to what extent agencies comply with the ESG’s requirement in respect to students’ involvement and what recommendations have been given by the external panel to increase their inclusion and voice.

Austria

Austrian Accreditation Council: External expert teams appointed by the OAR do not include student members, but the agency is conscious of the importance and urgency of this issue. External Panel identified the necessity of student participation in teams of external experts for the agency and urged OAR to promote students' inclusion at least in cases of reaccreditation in order to ensure that the subject matter to be assessed is actually relevant to existing educational quality. *Private Sector:* from the dialogues with student representatives it was discovered, that students in private universities seemed less interested in QA activities; lack of their interest/inclusion did not cause any major problem in Austrian context, before private sector started extending rapidly; its rapid growth brought the need to find ways to enhance the "visibility" of students from private universities both in external and internal QA. In panels' view the Agency should ensure students participation in private universities' QA systems is made mandatory through including this particular requirement in agency's standards and guidelines. The issue of student membership of the council was intensively discussed by the review panel, but there was no final agreement reached. Majority held on to the opinion that students' inclusion in the council was not desirable, as the council was to consist only of those members who had adequate experience and expertise in the realm of university teaching, research and management; only minority considered students' membership desirable on the ground that the agency was to comply with requirement of the Bologna Process in respect to students' participation. The agency is aware of the growing importance of this issue and intends to review future possibilities of integrating students to a greater extent in the accreditation processes. Due to the fact that there is no student representative in a group of experts conducting external assessment, the OAR is only partially complying with the ESG' criterion on students' inclusion. **ENQA Full Membership: 2001/ Reconfirmed 11 June 2008** (ENQA 2007/OAR 2007).

Austrian Agency for Quality Assurance: The Austrian Agency for QA was established in early 2004 as non-profit association consisting of four full members: The Austrian Rectors' Conference, the Fachhochschule Conference, the National Union of Students and the Federal Ministry of Science and Research. AQA has succeeded in attracting students into its activities on a number of levels: the Austrian Union of Students is present in AQA's committee structure; a student representative has an observer status on the Scientific Steering Group; representatives from student bodies have participated in the initial design of AQA projects and processes. Inclusion of the students' voice in the strategic management of the agency is greatly appreciated by representatives of the Union of Students, but they also note that

students have been excluded from some AQA events. It was discovered by the panel that students had been involved in the various aspects of AQA's QA activity "as a relevant source of feedback on the educational experience, both through questionnaires, through meetings and round-table discussions with student groups and representatives" (ENQA 2007:14); Although there is no evidence that students are currently involved in the review processes/accreditation procedures as members of review teams. "The panel heard that AQA plans to involve students more directly in review teams in the later phases of its Quality Management initiative with universities, and some pilot projects are underway" (ENQA 2007:14). However, there is no formal mechanism for direct student participation in reviews negotiated with the pertinent national student body. In general AQA has taken a productive and encouraging approach to engage students in its activities, but the progress in this direction has been constrained by contextual factors which were out of the control of the agency. The Agency has failed to involve students in a systematic manner and it has not yet managed to engage students directly as members of review panels in spite of the fact that "the involvement of students on panels was clearly identified as a binding condition of the proposed AQA audit procedure" (ENQA 2007: 29).

Recommendations proposed by ENQA to put into practice of the Agency's operations: The panel encouraged the agency to strengthen its efforts towards students' inclusion and have them represented in teams of external experts at least in cases of reaccreditation. **ENQA full membership granted on June, 11 2008.**

The Austrian FH Council: FHR – Fachhochschulrat: FH Council plays numerous roles in the Austrian HE system: it operates as accreditation body, as advisory board for FH degree programmes, as strategic planning unit for the FH sector and as regulatory agency and appellate board for students. As members of FH Councils need to possess the capacity to make knowledgeable conclusions on pedagogic and didactic matters, they are obliged to have adequate academic qualification or at least several years' experience in the professional fields relevant to the FH degree programmes, therefore students are not represented in the FH Council due to their limited knowledge and experience. Panel considers no students' participation as members of the FH council and in the team for the evaluation and development of new FH degree programmes regrettable and encourages the agency to have students involved as equal partners in the FH Council' activities (in the development and assessment procedures of degree programmes). The following recommendation was given by

the panel: to launch the dialogues with the national union of FH students and discuss with it how this situation can be amended. *Finding:* Student representatives are not involved in the FH Council procedures and in the FH Council. The panel encouraged the FH Council to commit itself towards building a national union of students at Austrian Fachhochschulen. **ENQA Full Membership: 2000/Reconfirmed 11 June 2008** (ENQA 2007).

Flanders

Since the “Bologna Decree” (2003) it has become an obligation to involve a student as a member of the external panel. The student is supposed to be enrolled at one of the institutions where the field of study is organized. The student is a fully-fledged member of the review panel having the same rights and obligations as other members; also receive a daily allowance similar to a well-paid student-job. In order to protect the authority of the panel, no member is allowed to have any links with one of the visited institutions or any potentially biased organization; therefore students are not allowed to visit their own institutions. For certain fields of study it is nearly impossible to find enough candidates for the external evaluation, especially in those ones which are offered at polytechnics. Lack of candidates from polytechnics’ students can be explained by their higher workload, as they are to fulfill attendance requirements, are expected to contribute actively throughout the year and participate actively in internships. Polytechnic students are interested to participate in external review panels, but they fear that they will not be able to handle their workload; also they are discouraged by their parents to participate and are asked to concentrate more on their studies rather than on extra curriculum activities. Usually student participation and representation is less elaborate at polytechnics and students from polytechnics only learn about the existence of such systems once the job advertisement for the expert panel member is announced (ENQA 2009).

EUA-Institutional Evaluation Programme of the European University Association (Belgium): IEP has made a major improvement in respect to the inclusion of student members on its evaluation panels. The Steering Committee has demonstrated its consent about including students’ members, it has defined the role for student members, set recruitment procedures for student panel members and has provided adequate training for them. Currently students are represented as full members of both the evaluation panels and the expert pool and are also involved in the annual three-day training seminars for the expert pool. The panel concluded that the IEP evaluation procedures satisfy the expectation of the

ESG and identified students' membership as one of its notable strengths, therefore the criterion on students' inclusion is substantially compliant. **ENQA Full Membership: 2000/Re-confirmation of Full Membership on 7 September 2009** (ENQA 2009).

VLHORA - Council of Flemish Institutions of Higher Education (Belgium): The panel includes five members (an education expert, experts in the discipline, as well a student). The composition of the panel is submitted to the Recognition Commission which operates under the Flemish government. The General Assembly, the Executive Board and the Quality Steering Committee of VLHORA comprise of people coming from the university colleges, but students do not appear as members of these bodies, they are only authorized to fully participate in meetings. In some cases they appear as observers at the meetings if such necessity is identified. No further information is provided in respect to the ESG' criterion on students' involvement in the external expert panel. **ENQA Full Membership: 2000/Reconfirmed on 23 January 2009** (ENQA 2008).

VLIR - QAU - Flemish Interuniversity Council Quality Assurance Unit (Belgium): Experts undertaking the external QA activity have to be equipped with adequate skills and be competent to perform their task efficiently. The review panel comprises mainly of peers from the discipline (one education expert is also present) and there is always one seat reserved for a student member (although there are cases when there is no student showing interest for participation). In spite of the fact that the presence of one student member in the review panel is defined mandatory, if appropriate student is not found for the external assessment, the panel is still liable to deliver a valid report without their feedback. 3 out of 34 assessment panels (around 10 percent of the cases) performed their evaluation without students' participation due to the fact that students withdrew their candidacy shortly before the assessment visit or due to the fact that the HE Recognition Commission did not regard students to be independent enough to permit their participation in the external assessment. The panel recommended the agency eliminating such shortcomings in the future and advised it to take appropriate measures to rectify this situation. It was discovered from the meeting with representatives of the student organization that they could not actually play an active role in external assessment. There were no procedures in place to actively contract students of programmes which were to be evaluated. The VLIR-QAU was recommended to launch cooperation with the student organization around the formation of a pool of students for panel members. The panel also noted that despite the desirability for the student member of a panel to be enrolled

exactly at the same programme/discipline being under review, no restriction should have been made in this respect; hence the recruitment of students from related disciplines/programmes could enlarge the number of available students and facilitate their recruitment for assessment panels. The VLIR QA Unit fully complied with the ESG 3.7 covering the criterion on students' inclusion. **ENQA Full Membership: 2000/Reconfirmed 7 September, 2009** (ENQA 2009).

NVAO-The Accreditation Organization of the Netherlands and Flanders: A student member should be present on the panel in external assessment and also participate in internal QA of HEIs. Despite students' participation during regular accreditations, they are not represented on the review panel during the initial accreditation phase, which was clarified by the NVAO executive board by the following statement: "there is no student in initial accreditation panels as there is not yet a running programme with students enrolled" (ENQA 2007: 48). Despite of the explanation, student representatives still urge the agency to allow students' participation in initial accreditation procedures as well. The external review panel of the agency advised NVAO to allow students' representation in the General Board due to the fact that their inclusion in the board is acknowledged as an international good practice. **ENQA Full Membership: 2003/Reconfirmed 20 December 2007** (ENQA 2007).

Scandinavia:

As a rule, Finnish and other Nordic evaluations teams include a student representative. It is well acknowledged that students' involvement in the evaluation teams is not important only for securing the richness of the student perspective, but also publicizing the outcomes of evaluation. When students are present in evaluation teams as equal team members, they have a better potential to disseminate the effectiveness of the evaluation results through student unions and with their participation they add legitimacy/reliability to the conclusions of the panel for those students at the evaluated institutions. (ENQA 2009: Aas *et al.* 2009). Having student representatives at faculty, institutional and agency levels has become the key for success for Norway and Finland.

NOKUT - Norwegian Agency for Quality Assurance in Education: Judging from Norwegian experience students have been involved in the majority of external evaluation panels, have been full members of the expert committees participating in the accreditation process of institutions and have been represented on the Board of NOKUT. According to the

study on students' participation in external evaluation panels NOKUT has benefited from students' involvement in its QA processes and intends their further inclusion in forthcoming evaluation processes as well. NOKUT's Board of Governors has the overall responsibility for NOKUT's activities/decisions and a student member is present as a matter of fact on this Board. Students' members are usually seen in the panels for the audits of the institutions' internal QA system, institutional accreditations, reaccreditations and general evaluations. Students represented in NOKUT's expert panels have been previously board members at different levels within institutions therefore are well aware of QA procedures and mechanisms; also all panel experts including students get additional training through joint seminars before commencing their work in the committees (ENQA 2006: Alaniska *et al.* 2006).

Audit of the institutions' internal QA system is the basic cyclic element in the Norwegian system of QA in HE and there are predetermined requirements for the composition of the panels for those audits; having a student representative on an external panel falls under above mentioned requirements. The pool of experts usually includes those students which are nominated by national student union. Experts represented on the panel are obliged to have an experience as academic leaders, developers and evaluators and possess a recognized scholarly reputation. NOKUT re-evaluates a previously awarded accreditation and the review panel is required to have a student representative. A study was conducted on external experts functioning in Norway concerning their experience, knowledge and perceptions; questionnaires were sent to 45 experts (70 % academics and 30 % students) and it was discovered that working as members of external experts was perceived positively by all respondents, as they demonstrated their satisfaction with working conditions for carrying out audits procedures. 60 % of panel members acknowledged that their knowledge and competencies were valued and efficiently used by the expert panels and final decisions/conclusions were made by consensus. **ENQA Full Membership: 2000/Reconfirmed 11 June 2008** (ENQA 2008).

NAHE - National Agency for Higher Education (Sweden): The external panel of experts in the subject and programme reviews usually consists of Swedish and Nordic subject experts, students and, where applicable, PhD students. Introduction meeting is organized by the agency through which experts obtain necessary information for evaluation: also enrich their insight in general overview of Swedish HE system. Seminars have been organized with

participating students and doctoral students of expert panels to have their experiences discussed. The Swedish experts on a panel never participate in the evaluation of those institutions where they have been active themselves in order to prevent the biased evaluation. Students are always represented in review panels as a matter of principle. **ENQA Full Membership: 2000/The ENQA Board re-confirmed the Full membership of NAHE (HsV) in ENQA in September 2006 on the basis of the external review of the Agency conducted in 2005 (ENQA 2006).**

EVA - Danish Evaluation Institute: In EVA students are appointed as evaluation assistants and are not represented at external panel, which is considered to be the agency's major shortcoming. The following recommendation was proposed to the agency: have student representatives in the external panels for HE as "the questions posed by students and pupils differ from those of established teachers and researchers and therefore help to widen the perspective of the evaluations" (ENQA 2005: 38). Currently, EVA is considering the possibility of having a student view-point represented on the panel. **ENQA Full Membership: 2000/The ENQA Board re-confirmed the Full membership of EVA in ENQA in September 2006 on the basis of the external review of the Agency conducted in 2005 and of the supplementary review that looked at EVA's compliance with the ESG which was completed in 2006 (ENQA 2005/EVA 2008).**

Finland/ FINHEEC

In Finland, HEIs are responsible for education as well as for the quality of their other activities. Each HEI builds the QA system that best suits its needs. The HEI decides and is responsible for the special objectives of QA, the methods to be used and the ways in which the methods can be developed.

In Finnish context students, just like academic staff, are acknowledged as knowledge-seekers, but only possessing a different level of experience. During the development of the QA systems, the Finnish HE Evaluation Council emphasized the necessity of students' involvement and supported HEIs by providing trainings to create a more student-oriented QA system. In Finnish context students' roles are divided into four categories: a. students as information providers: participating in QA by providing the feedback (e.g. providing feedback concerning their perceptions, problems around a taken course and giving suggestions on how to improve the course content/structure); b. a student as an actor:

students' role goes beyond being information providers, they themselves design feedback questionnaires and collect/analyze the feedback themselves; c. a student as an expert: Acknowledging the fact that the emphasis of QA should be on the quality of learning rather than on teaching, the role played by students in its assessment cannot be questioned. In Finland students are regarded as experts in learning processes recognizing themselves how they reach learning outcomes and comprehending in what ways teaching contributes to their learning process. Hence, it is well understood that teaching should be judged through students' learning experiences and evaluated on the criterion to what extent it contributes to efficient learning process. Treating students as experts is a cultural expectation, which requires a positive attitude both from the staff and from the students and takes years to create an atmosphere where students' feedback is considered as a constructive feedback from a real expert. But students' full representation in development teams is a clear proof that Finnish HE has managed to create an atmosphere where students' competence and expertise is valued and well accepted by other staff members; d. a student as a partner: learning is only accomplished through tight cooperating between teachers and students. "The notion of partnership between students and staff members represents the possibility of an authentic and constructive dialogue which offers the opportunity for more reflective feedback". In Finland staff members have ensured treating students as partners and established a positive atmosphere for cooperation leading to an open and authentic QA (ENQA 2006: Alaniska *et al.* 2006: 15).

FINHEEC appoints the audit group composed of 5 members: 3 HEIs exponents, one student representative and one work life representative. Students are represented in re-audit groups as well. Students are active and committed participant and play a meaningful role in QA activities, therefore are equipped with equal rights as other expert members (FINHEEC 2007).

OAQ - Center for Accreditation and Quality Assurance of the Swiss Universities:

Traditionally there was a weak tradition of student participation and their role was vague in the Swiss HE system. Guidelines for academic accreditation in Switzerland introduced in 2003 did not specify any regulations for student participation in the expert panels of accreditation procedures; hence, student representatives participated only in the self-evaluation phase, but did not act as experts of learning during accreditation activities. Before 2006 Switzerland had no student involvement at all in its external QA, only after the revision of the guidelines for accreditation it became possible to integrate students into expert panels. The demand for more students' integration in external QA came mainly from outside (ENQA

and the ESG). The revised guidelines for academic accreditation introduced in June 2007 granted the OAQ the legal basis permitting students to become members of expert panels for institutional and program accreditations and nowadays OAQ considers students' participation on all levels of the accreditation process as an essential issue; Special training is organized by VSS-UNES-USU for future student experts and once recruited students are treated within the expert panels with equal status, similar rights and tasks as other panel members. **Full Membership granted 12 December 2006** (ENQA 2006).

NEAA - National Evaluation and Accreditation Agency (Bulgaria): Students participate in the decision making bodies of HE in the percentage of 25 %. Expert teams are contracted under temporary agreements to conduct the site visits to the HEIs under evaluation; students usually appear in those teams, but are not considered as full/formal members. NEAA follows a consistent policy aiming at involving students in the evaluation procedures on a regular basis and its regulations in this respect are compiled in the document called "Rules for Students' Involvement in Evaluation and Accreditation Procedures". Students' selection is handled in cooperation with the National Assembly of Students' Council and the management staff of the HEIs. Involved students are usually taking post-graduate studies at PhD level and some of them are professional accreditors as they have been involved in more than 15 accreditation exercises conducted previously by NEAA. They are involved in some meetings of the site visits to the institutions, but submit a separate report focusing only on students' issues. Those Reports are taken into consideration in the accreditation process by the Standing Committees and by the accreditation council, but "there is no mechanism in power that guarantees the consideration of the student parallel report in drafting the final report. Practically, the integration of the student perspective in the final report depends on the approach taken by the respective Standing Committee" (ENQA 2008:32). Some students stressed that "their independent status gave them more freedom of operation and increased their credibility in the eyes of the students they consult" (ENQA 2008: 19). NEAA pays low fees to the members of the expert teams and the students, who are involved in the accreditation processes which could lead to a lessened interest for participation in the accreditation procedures. NEAA has constructed a system for students' participation in the external quality procedures on a regular basis, which was not actually anticipated by the law. *Recommendation:* student participation in expert teams should obtain the status of full membership (not limiting their role solely to external advisers for the expert teams reporting

merely on a limited number of aspects). **Full membership granted 25 September 2008**
¹(ENQA 2008).

United Kingdom

QAA - Quality Assurance Agency for Higher Education (UK):

In UK each HEI is responsible for maintaining the standards and quality of their degrees. Most HEIs conduct regular monitoring and periodic reviews of their study programmes and invite external experts to examine their internal QA processes. In UK context students' inclusion is integral to both internal and external QA systems. Students are present at institutional audits and institutional review processes.

Scotland: Engagement with students is an integral part to agency's work and is a key focus of the Quality Enhancement Framework, which has been developed and co-managed together with student bodies to assist HEIs to assure and enhance the quality of their programmes and awards. Scottish QAA has taken the lead in having students' representatives in quality management in UK's HE, therefore students have been represented on all working groups and committees of the agency (including the QAA Scotland Committee). The agency is one of the partners and members of the steering committee of SPARQS (Scottish organization providing trainings to student representatives). Student members are included on the steering committees for agency's Enhancement Themes. In Scotland student representative bodies cooperate with institutions in preparation of the Reflective Analysis and QAA's student strategy implies students involvement not only in audit teams, but also encourages student engagement with quality-related activities within institutions (QAA Scotland 2010).

But in England, Wales and Northern Ireland student representative bodies submit a student written submission separately from the self-evaluation document drafted by the institution itself, but contributes to the preparation of the institutional self assessment report. Students' voice is essential information for the audit/review team when they are attempting to make

¹ NEAA has an active poll on students' inclusion: **Do you approve student involvement in NEAA procedures?** Fully convinced (610); Rather convinced (413); Rather no (244); Can (179) (<http://www.neaa.government.bg/en?answer=1> retrieved on April 14, 2010).

judgments about an institution's QA; their input into the institutional audit process is regarded as valuable, as it promotes the focus on assuring and enhancing the quality of the student experience. However it is still believed that auditors and reviewers who make up the audit/review team need to be experienced members of senior institutional staff and not other stakeholders for instance students or employers.

Hence, there is a different speed in operation within the QAA's country structure in respect to students' inclusion. In Scotland students are represented in review teams as full member and there are plans to apply the same procedure to other parts of the UK. QAA in Scotland have attempted to develop a greater voice for students in quality systems by supporting a national development service known as Student participation in Quality Scotland. As of January 2008 English institutional audit teams include a student observer and it is anticipated to have this role upgraded to full membership by the next audit in 2011 if not before it (QAA 2010).

Compliance with the ESG: QAA is not yet fully compliant with the expectations of the standard relating to the inclusion of a student member on external assessments. The external panel emphasized that delaying the introduction of students' inclusion in assessment processes could hinder the evolution of QAA and urged it to take appropriate and prompt measures to prevent such happening (ENQA 2008).

QAA's Strategic plan 2006-11 emphasizes students having key interest in the safeguarding of academic standards and in the continuous enhancement of quality management; therefore it values and encourages their engagement in the assurance of academic standards and quality. As having students as active participants in their own education is an essential feature of UK HE, the need for students' direct involvement in the HE's approaches to QA and enhancement is well acknowledged. According to this strategy agencies intend to extend their work with students and their representative bodies to encourage and promote activities that efficiently engage students in the processes and management of QA. For this purpose they have established four aims for QAA's work on student engagement: Aim A: Work, with others, to provide clearer information on quality and standards for students. (Identify information on quality and standard which would be valuable to potential and current students); Aim B: Build partnerships to improve students engagement in QA: cooperate with the representative bodies of students and promote the benefits of students' involvement in quality management and encourage students engagement in their work; Aim C: Work with HEIs to develop the role for students in institutional quality management: share best practices and international

developments in this context and provide guidance on student participation in institutional QA processes; Aim D: Support more genuine involvement of students in QAA's QA and enhancement processes: promote more direct participation of students in agency's work, move toward involving students directly in institutional level review processes, authorize students with voice at Board and Committee levels and share best practices of students' inclusion. The agency has invested in additional staff and project fund resources to sustain this activity (QAA 2006). **ENQA Full Membership: 2000/Reconfirmed 19 November 2008.**

Ireland

HETAC - Higher Education and Training Awards Council (Ireland): The council uses its reviewers on four different types of review panels: programme validation panels, delegated authority evaluation/review groups, research accreditations and approval panels and standards expert groups. A feature of the current arrangements applied by the agency is the use of students as reviewers; therefore, external assessment panels for delegation of authority always include a student member (from another institution), those relating to research degree programmes (accreditation to maintain a register) usually include a recent graduate (not currently connected with the subject institution) to represent the student's perspective. Other HETAC evaluation panels do not have student representatives as experts, but closely operate with learners in other ways. The panel advised the Council to provide initial and ongoing training to its reviewers and restrain those members who have not undergone such training from becoming a member of a review team; it also advised the council to apply more pragmatic approach to the selection and deployment of its reviewers. **ENQA Full Membership: 2000** (ENQA 2006/HETAC 2006).

IUQB - Irish Universities Quality Board: The IUQB's activities have also brought a modified and valuable focus on the role of the student experience to Irish context. It has expressed a rising interest in reaching out to the student community through the endorsement of mechanisms for improved student involvement. 30% of the review teams is representative of students. No additional information is provided to what extent students are involved in the external review panels. The report only states that the agency is fully compliant with the ESG's requirement concerning the external QA criteria and processes used by the agencies. **Full membership granted 02 June 2009** (ENQA 2008).

NQAI - National Qualifications Authority of Ireland: student representatives are present at the panel and the agency complies with the ESG. No further information is available in the report concerning their role and authority. **Full membership granted 5 March 2008** (ENQA 2007).

Spain

AQU-The Agency for QA in the Catalan University System: has included student members in the review teams regarding the evaluation of library services and student representatives have demonstrated their interest and dedication to participation in such evaluation activities. The agency has commenced building up a pool of students who will be trained to participate in external evaluations and it has also started working on the constitution of a consultative committee composed of students; As a matter of fact students are consulted, but are now allowed to participate in internal evaluation. Training course for ensuring the effective involvement of students on external evaluation committees has been launched. In compliance with AQU Catalunya's quality procedures one student representative should be included in external evaluation of current degree programmes, but as students' participation in AQU Catalunya's external committees is a recent phenomenon, their involvement in institutional assessment processes is still at a very low level. *Recommendation:* Increase students' participation in external QA processes in the universities: appointing a postgraduate student as a new member of the committee. Adequate actions should be taken for building up a consultative committee composed of students and training for participating students should be regularized conforming to the similar criteria established for other external evaluators. **ENQA Full Membership: 2000/Reconfirmed 07 September 2007** (ENQA 2007).

ANECA-the National Agency for the Quality Assessment and Accreditation of Spain: The review panel includes a student representative, but students' involvement as members of evaluation committees is not a part of ANECA's practice. The agency has established a special Working Group dedicated to students' inclusion issue and encouraged its members to discuss and propose initiatives for enhanced student involvement in the evaluation processes. The agency has prioritized students' involvement in the processes of QA agencies for 2007. According to the Action plan for year 2009 ANECA has managed to incorporate students as assessors in its assessment processes and formalize the regular training for students. **ENQA Full Membership: 2003/Reconfirmed 20 September 2007** (ENQA 2007).

AGAE-the Agency for Quality Assurance in Higher Education and Research of Andalusia: The review panel identified that it had not been a tradition within Andalusia to have students represented as reviewers, although the panel was pleased to discover that there was a probability for such a trend to change in the nearest future with the setting up of a new Student Council for Andalusia. Students have been involved in the internal committees for the evaluation of the Plan for the Quality of Andalusian Universities and have been interviewed in the institutional assessment programmes. In its own self-evaluation, the agency has underlined the need and desirability of enhancing students' participation in external QA processes of the universities, which is also in line with the locally accepted perceptions about promoting students' active involvement in all aspects of the governance of the university system in the Region. AGAE intends to include students in the assessment of proposals for the new postgraduate programmes, in the accreditation of already established postgraduate programmes of Andalusian Public Universities and in the teaching performance assessment. As the review panel of AGAE acknowledges students' inclusion in external review procedures to be in full conformity to the spirit of the ESG, it urges the agency to launch students' participation as soon as workable. *Compliance to the ESG:* Student participation on AGAE's external committees is limited. **ENQA Full Membership: 2000/Reconfirmed 16 March 2009** (ENQA: 2009; AGAE 2010).

ACSUG-The Agency for Quality Assurance in the Galician University System: Expert panels are carefully selected and always include a student member in the evaluation processes. The agency has a predetermined selection procedure for students: they are allowed to apply for their positions in the panel by sending CV and cover letter and once selected are trained through one-day workshop. A student representative is as well present at advisory board of ACSUG. The panel discovered that student experts were well integrated in the panels, their opinions were taken into consideration during the evaluation procedures and their involvement was acknowledged valuable by the review team; In 2007 ACSUG was granted a candidate membership of ENQA and in order to satisfy the criteria for full membership, it was requested to take into consideration the recommendations given by ENQA and make appropriate amendments; one of those recommendations was to clarify and provide more detailed information about the role of students in external panels, as previously "it was not clear whether, or to what extent, students were involved in the external expert teams" (ENQA 2009: 44). *The ESG's Fulfillment:* Fully Complaint. **Full membership granted 16 November 2009** (ENQA: 2009).

ACSUCYL-Quality Assurance Agency for the University System in Castilla y León: Since 2007 ACSUCYL has developed instruments to establish student participation in its activities. For this purpose the agency has arranged seminars and training workshops. Currently students participate in the procedures for the verification of degrees, the follow-up and accreditation of degrees. The external panel acknowledges the ACSUCYL's full compliance with the ESG, but encourages the agency to engage students in its assessment panels as well. **Full membership granted 5 February, 2010** (ENQA 2009).

Romania

ARACIS - Agency for Quality Assurance in Higher Education (Romania): Students are involved in the management structure, but their main responsibility is to act as a source of input. Students note that cooperation between students and management differs before and after ARACIS evaluations, they favor collaboration with the management before than after ARACIS site-visits. Students, who have been recently permitted to participate in the panels for study programme's evaluations, arrange their own training and selection. Students take their part in institutional evaluation, in the review panels for study programmes and are represented at a panel of independent experts carrying out external evaluations. The recent participation of students in the panels for study programmes is acknowledged as an essential step taken forward by the agency and compliance with the ESG's criterion is considered to be substantial. **Full membership granted 2 June 2009** (ENQA 2009).

Germany

The introduction of Bachelor and Master degree programmes into German Federal HE Law necessitated the need to replace inflexible and inappropriate traditional system of directives with more flexibility in designing and performing study programmes. This condition subsequently led to a decision to establish a system of Accreditation of study programmes. Thus, it was created as a meta accreditation body of the new system and a system of Accreditation agencies was to take the responsibility of peer reviews of study programmes and make adequate accreditations decisions. As a rule the accreditation Council consists of four representatives of HEIs, four representatives of Lander governments, five representatives of the labor market, two foreign experts and two student representatives. Accreditation bodies are required to establish a decision-making body which will take the responsibility of all final accreditation decisions. The agencies are obliged to foresee student representatives as

members with full voting rights in the decision-making bodies and ensure involvement of all relevant stakeholders (including at least academia, students and the labor market) in the composition of peer groups performing site visits of study programmes.

GAC - German Accreditation Council:

The Accreditation Council is the central decision-making body responsible for all activities related to the accreditation of agencies and study programmes. Two student representatives are present at the accreditation council. Student representatives appear very critical of the system accreditation and utter their concerns that only few HEIs possess appropriate structures needed for the system accreditation. “The student representatives strongly criticize the direct influence of politics, mediated over the ministerial bureaucracy involved with the decision-making of the accreditation Council. Even the introduction of the system accreditation cannot be understood or explained without the influencing control of the ministries” (ENQA 2008: 25). The Council appoints a panel of experts for the evaluation procedure consisting of five members and representation of one student member is a must. The Report does not specify the role of students in the council, but the overall conformity of the agency to the ESG 3.7 (external QA criteria and processes used by the agencies: students’ inclusion in the external panels being one of the subsections of this particular criterion) is perceived as fully compliant. **ENQA Full Membership: 2000/Reconfirmed 04 September 2008** (ENQA 2008).

ZEVA - Central Evaluation and Accreditation Agency Hannover (Germany): The members of the Standing Accreditation Commission include student representatives. The agency provides the training courses for all members participating in the accreditation procedures. The evaluation report only demonstrates that ZEVA has complied with the ESG Standard 3.7, but does not provide any additional information about students’ role and legitimacy within the panel. **ENQA Full Membership: 2000/Reconfirmed 04 September 2008** (ENQA 2005).

ACQUIN - Accreditation, Certification and Quality Assurance Institute (Germany): Technical committee appoints the group of evaluators which includes three representatives of HE establishments, one representative of the practitioners from the profession and *one student representative*. The group of experts assesses the self-evaluation of the applying HE establishment, carries out peer review and drafts an evaluation report for the technical

committee and the accreditation commission. Large number of student peers comes from departments of scientific members of the group of evaluators and the diversity and independence of perceptions required for the evaluation is jeopardized, therefore more attention should be directed to the recruitment of independent student representatives. The agency was advised to find ways to increase students' engagement in the review processes of HEIs. **ENQA Full Membership: 2003/Reconfirmed 20 September 2007** (ENQA 2006).

AHPGS-Accreditation Agency for Study Programmes in Health and Social Sciences (Germany): The agency involves students for fulfilling its functions and they are represented at all level (procedural steps, functions) of the programme and system accreditation in an appropriate manner. In spite of the above mentioned statement it is surprising to discover that external review panel acknowledges AHPGS' compliance with the ESG's criterion only partial conformed, although there is no further information provided to clarify identified level of compliance. **ENQA Full Membership: 2009** (ENQA 2009).

AQAS-Agentur für Qualitätssicherung durch Akkreditierung von Studiengängen (Germany): The agency employs five student assistants, but the evaluation report of the agency does not specify which specific role they play within the organization. The formation of the expert committees does not satisfy the requirement of having all relevant stakeholders represented in the accreditation process and there is also no evidence on students' inclusion on the panel; there is also scarcity of students' participation in many audit-teams; AQAS justifies this situation by the argument that there is not sufficient students of certain HEIs available for the accreditation procedure as it can only accept students from the respective type of HEIs (University or University of Applied Sciences). In order to rectify the situation the Accreditation Committee has introduced a "mentor" system to its structure, which grants the mentor a technically affine membership of the Accreditation Committee, but does not equip it with the full membership authority. **ENQA Full Membership: 2008** (ENQA 2007).

ASIIN-Accreditation Agency Specialized in Accrediting Degree Programmes in Engineering, Informatics, the Natural Sciences and Mathematics (Germany): Members of the Accreditation Commissions are appointed by the managing committee and usually include student representatives; Although the revised overview of the members of the panel does not evidently demonstrate to what extent students are represented in those accreditation procedures, it only mentions the fact that the partnership with the students accreditation pool has been considerably enhanced in comparison to previous years. Therefore the agency is

obliged to prove in what manner it fulfills the requirement of the ESG on students' participation in order to enhance our understanding about the agency's attitude in respect to this specific issue. **Full membership granted 27 February 2007** (ENQA 2006).

EVALAG – Evaluation Agency Baden-Wuerttemberg (Germany): Accreditation commission is responsible for all accreditation-related tasks in respect to the accreditation of study programmes and QA of HEIs. The commission includes two student members (one as a representative of universities and one as a representative of universities of applied sciences). The criterion on representation of a student member is ensured in the agency; therefore EVALAG fully complies with the Standard 3.7. **ENQA Full Membership: 2001/Reconfirmed 5 February, 2010** (ENQA 2008).

FIBAA - Foundation for International Business Administration Accreditation (Germany): The members of the Accreditation Commission are appointed by the Foundation Board and work on a voluntary basis. There are two student representatives involved in the Commission. In the self-evaluation report the agency did not provide the list of the criteria for the appointment of reviewers and therefore was asked by the external review panel to submit it shortly. The agency was advised to include the members from the student accreditation pool in its operations in order to ensure the reliability of evaluation judgments. **ENQA Full Membership: 2001/Reconfirmed on 20 December 2007** (ENQA 2006).

France

CTI - Commission des Titres d'Ingénieur (France): To perform its audits, CTI appoints a group of experts consisting of 3 to 6 members depending on the size of the evaluated institution. Together with one academic and one professional member, one student representative is always present on the panel. Student's participation has been systemized since 2009 and students themselves confirm that they have been treated with equal rights as other experts on the review panel. Therefore the commission's conformity is fully compliant with the ESG's criterion on students' inclusion. **ENQA Full Membership: 2005/Reconfirmed 2 June 2009** (ENQA 2009).

HAC-Hungarian Accreditation Committee: A student is represented in the external evaluation by a group of experts and is involved in the site visits of HEIs. The Hungarian Association of Doctoral Students is a regular participant to the HAC plenary meetings and

consultations with it is an ongoing procedure. The agency actively cooperates with the Hungarian National Association of Students Unions to identify student representatives for institutional evaluations. HAC perceives students' passive interest in attending plenary meetings and participating in accreditation procedures regrettable, as it acknowledges the fact that quality can only be enhanced if tight and efficient cooperation with students are in place. *The following recommendation was given to HAC:* Reduce the number of the HAC's Hungarian academic members and enlarge the numbers of students, stakeholder and international experts as members of review teams; Include more students and establish students' voting rights on the HAC. *Compliance with the ESG:* Fully compliant. **ENQA Full Membership: 2002/Reconfirmed 04 September 2008** (ENQA 2008/HAC 2008).

Poland

PKA - The State Accreditation Committee (Poland): It has ensured a widespread and authentic involvement of student experts in its external assessment processes. Students are regularly present at expert panels undertaking external quality assessment visits of HEIs, the only case when they are excluded from the panels is when small number of experts are appointed to the panel to perform assessment of specific aspects of programmes (e.g. research achievements of a faculty, etc). In order to be appointed to expert panel students are required to take a test assessing their knowledge and skills. PKA has "created a large pool of competent and independent experts and has ensured genuine rather than merely token involvement of student experts" (ENQA 2008: 29). **Full membership granted 23 January 2009.**

Russia

NAA - National Accreditation Agency of the Russian Federation: The report does not specify the students' role in external expert panel; it only states that the agency has demonstrated substantial compliance with the ESG 3.7 (External QA criteria and processes used by the agencies). As students' inclusion in review panels falls under this category, one could assume the compliance with the requirement on students' participation was also detected within the agency's structure. *Only the following recommendation was proposed to the agency:* include more students in the QA processes, particularly in the self-evaluation procedures. **ENQA Full membership granted on 7 September, 2009** (ENQA 2008).

Having presented the data obtained from ENQA coordinated reports, I want to classify European external QA agencies into three different categories according to the nature of compliance in respect to student's inclusion in external review panels. Classification will be based on the judgments of applied mechanism for compliance: normative, coercive or cognitive and demonstration of prevailing characteristics of regulative, normative and cultural-cognitive systems within individual agency's structure/culture and operation.

4 Data Analysis

In this chapter I intend to introduce the analysis of the empirical data presented in the previous chapter. The chapter commences with the classification of the European external QA agencies and later on justifications applied for this typology are explored and analyzed.

Having reviewed the ESG, I identified that the requirement on students' inclusion in external reviews of HEIs fell under the list of obligations imposed by those standards, therefore every agency was obliged to implement this requirement in its organizational structure in order to prove its compliance with the above-mentioned regulations and sustain its reliability and legitimacy in the eyes of the QA community. To predict the level of acceptance and nature of compliance I decided to analyze each agency and identify on which one of three pillars (regulative, normative and cultural-cognitive) it has built its operation in respect to students' inclusion. After developing the theoretical framework for my research it was easier for me to understand why agencies responded in this specific manner and interpret their behavior with reliable justifications supported by well established theories. Having grasped the understanding of internal processes (characteristics, norms, beliefs prevailing within agencies) and possible external environment's influences on their operation, it appeared less complicated to predict/explore their actions. Therefore, based on the previous discussions one could claim that whether the agency was likely to hinder or encourage students' engagement greatly depended on the following indications: how its members perceived this requirement, which norms/cultural belief systems dominated within the agency's structure in respect to students' engagement and how adequately this requirement fitted into the established logic of appropriateness operating within the agency. As there are three possible frameworks: regulative, normative or cultural-cognitive through which the conception on students' involvement in external evaluations could penetrate internal culture of the agency, I classify all ENQA evaluated QA agencies under these three pillars of organizations. Application of different frameworks while interpreting and adopting the ESG's criterion on students' inclusion could account for detected variations in the nature of compliance and in the logic of interpretation of this requirement, for instance an agency perceiving students' participation through the regulatory framework, could comply due to enforced conventions and routines; an agency foreseeing students' involvement through the normative framework, could justify its compliance by acknowledging this requirement as a desirable action for the agency; but the agency acknowledging students' inclusion through the cultural-cognitive framework could

pursue its rational interests by conforming to this requirement. Hence, diversified cultural systems, norms existing within each agency in respect to students' role and extrinsic influences could explain students' uneven representation on external review panels among European agencies.

Table 3: Categorization of European QA Agencies According to the Nature of Compliance on Students' Inclusion in External Review Panels

Status		Nature of Compliance		
		Coercive	Normative	Cultural-Cognitive
Students Role	No Representation/ Limited Role	<ul style="list-style-type: none"> – OAR – FHR – VLHORA – OAC – OAQ – AQU Catalunya – AQAS 	<ul style="list-style-type: none"> – EVA – NEAA 	
	No Full Membership		<ul style="list-style-type: none"> – AQA – VLIR-QAU – NEEA – QAA (excl. Scotland) – HETAC – IUQB – NQAI – ANECA – AGAE – HAC 	– QAA (Scotland)
	Full Membership		<ul style="list-style-type: none"> – ACSUG – ARACIS – CTI – NVAO 	<ul style="list-style-type: none"> – FLANDERS – IEP – NOKUT – NAHE – FINHEEC – ACSUG
	Represented/Role not Specified	<ul style="list-style-type: none"> – AHPGS – NAA 	<ul style="list-style-type: none"> – GAC – ZEvA – ACQUIN – EVALAG – FIBBA – ASIN 	– PKA

Source: the Author, based on R. Scott 2001

4.1 The Compliance Prompted by Coercive Processes

- Rules and regulations (ESG, Bologna, UNESCO/OECD Guidelines) dominating in the HE environment have imposed student participation as a mandatory requirement to be adopted and implemented by each European QA agency functioning in EHEA.

Under this category I placed the following agencies: **OAR; FHR; VLHORA; OAC; OAQ; AQU Catalunya; AQAS and AHPGS, NAA** due to the detected similarities in respect to students' engagement. Therefore observed similarities are as follows: students' inclusion has been launched within agencies' operations, but this requirement could have been imposed externally (by prevailing need to comply with the ENQA membership criteria/conform to the ESG regulations) rather than evolved internally. One could argue that students' active involvement in agencies' operations is not yet intrinsic and well-established form of the organization structure, therefore, it is not a culturally embedded value/norm; although each agency acknowledges that the conformity to those predetermined requirements is the only possible way to sustain the legitimacy/functionality in the environment dominated by rational prescriptions and legal or law-like frameworks. As students' participation in agencies activities and their representation in external evaluations of HEIs have not been a common practice and tradition within above listed agencies, one could suppose that the ESG's criterion on students' inclusion was introduced as a new requirement prompting subsequent organizational changes. As a result the compliance with the newly imposed requirement could have been legally enforced and compliance could have been provoked either by fear to lose legitimacy/functionality, anticipation for reward in response to conformity or for punitive sanctions if demonstrating the non-conformance with those requirements. Agencies listed under this category could have defended themselves from externally enforced pressures by applying *avoidance* or *defiance* strategies: buffering some parts of the agency from the necessity of conforming to those requirements or resisting the agency from externally imposed pressures/demands (granting students partial authority: e.g. observers' status, hiring them as assistants for agency's operations and depriving them from the full membership and voting rights for external review panels). As it is hard to spot members' appreciation of the value added by students' participation in agencies activities, one could assume that they could remain unresponsive, react in a superficial way to the imposed regulation or demonstrate hostile defiance to it.

From the reports it was discovered that no student membership in the decision making bodies and no student representation in the external expert teams were often justified by the fact that students lacked adequate expertise, sufficient academic qualification and experience for the participation. Such mere explanations were encountered within OAR, FHR, AQAS operations. Therefore, one could argue that students have not managed to obtain sufficient authority to fully participate in agencies' activities, become accepted/equal members of the community, thus their engagement has taken more a restricted and limited nature. There were no elements of normative or cultural-cognitive systems detected within the operations of those agencies, which could justify that influential members of agencies held shared conception about the necessity of students' engagement or acknowledged it as a desirable value to be added to their activities. There was not enough evidence observed in the reports to claim that those agencies acknowledged the scarcity of students' representation on external panels as a noticeable shortcoming of agencies' operations or took appropriate measures to promote students' dynamic participation. As there were no indications found for follow up actions to remedy the situation or implement recommendations proposed by external panel even after reviewing individual agency's reports drafted in response to ENQA coordinated external evaluations, one could argue that this far students' engagement had not managed to become an intrinsic value and established norm within above listed agencies' culture. This factor clearly explains and justifies why student's role has been limited solely to an assistant/observer status. As there has been a weak tradition of student participation in above listed agencies and their inclusion in QA activities has been recently introduced, one cannot anticipate prompt and authentic acceptance for their engagement from agencies' side. As students' inclusion has been encouraged/imposed externally rather than promoted internally and as students have failed to gain legitimacy to participate in accreditation/evaluation procedures as equal members of the expert panel, one could assume that students' involvement has not yet become an integral part of agency's well-established norms/values and the compliance with this requirement has taken more a coercive character. Permitting students' limited participation, the agencies merely attempt to demonstrate their superficial compliance for the sake of securing ENQA membership status and detected compliance could fall under the passive acquiescing of an imposed regulation.

4.2 The Compliance Prompted by Normative Rules

- Students' participation should be in place according to normative framework: this is the norm how HE functions; therefore, their participation has been a common practice and tradition in the history of European QA agencies.

Under this category I placed all European QA agencies which have demonstrated moral/social obligation to comply with this requirement and anticipated to obtain normative approbation after conforming to the ESG. Therefore I included the following agencies under this category: **EVA, NEAA (Students represented with limited role); AQA, VLIR-QAU, NEEA, QAA (excl. Scotland), HETAC, IUQB, NQAI, ANECA, AGAE, HAC (Students with no full membership rights); ACSUG, ARACIS, CTI, NVAO (Students with full membership) and GAC, ZEvA, ACQUIN, EVALAG, FIBBA, ASIN (Students role not specified).**

Agencies listed under this category felt normative pressures to ensure that their goals corresponded with wider societal values. As those agencies perceived students' engagement through the normative framework, they applied *an acquiescence (conformity) strategy* once confronted with the ESG's criterion on students' participation and started imitating other similar organizations in order to sustain their legitimacy in the eyes of external environment. In those agencies the normative pillar prevailed, therefore students' representation in the review panels was perceived favorable for agencies' well-being and was acknowledged as an established norm and normative expectation for all of them.

From the reports it emerged that the above mentioned agencies pay adequate attention to students' engagement and actual proofs for their dynamic involvement in agency's various activities have been encountered. Thus, one could claim that the fulfillment of the ESG's criterion on students' inclusion has gone beyond involuntarily/superficially fulfilling the requirement imposed by legal/rule-like frameworks.

In the context of above mentioned agencies the role, status and legitimacy of students vary. In some agencies one seat is always reserved for a student and their representation in external review panels is mandatory but they still do not have full voting rights; in others they participate in the initial design processes of agencies' projects and (in rare cases) they are represented with equal and full membership status. Hence, one can argue that students are regarded as relevant and valuable feedback providers and that other agency members

acknowledge the added value brought by student participation. Yet, the evidence in the reports is not sufficient to prove that students' involvement is embedded in the internal cultural norms of these agencies. Students' partial inclusion in review panels can be interpreted as an agencies' attempt to fit in the frame of acceptable/appropriate organizational forms. Moreover, there are also no indicators in the reports proving that agencies see no alternative to student participation in external reviews or that they acknowledge student engagement as the only possible and appropriate way to handle external assessments of HEIs. In fact, if this were the case, one would expect agencies to allow students more authentic engagement and official status with equal rights.

The logic of appropriateness has guided those QA agencies to recognize students' inclusion in the review teams as an acceptable organizational behavior based on a taken-for-granted assumption of their members; therefore conformity to this specific requirement has fallen under the framework of normative expectations within agencies' structures, although acknowledging students as equal partners in external review panels has not stemmed from agencies' internal culture and belief systems. The acceptance of students into group of experts was prompted and encouraged by the norms/expectations prevailing in the environment of European external QA agencies functioning in EHEA.

4.3 The Compliance Prompted by Cultural-Cognitive Norms

- Shift to student-centered teaching-learning (acknowledging students as purposeful partners in learning), shifts to centrality of students and relevance to students' needs and expectations (students representing the main and powerful stakeholders in HE) have reshuffled students' role in HE community and have given an adequate ground to acknowledge students' feedback as an intrinsic value/norm of QA activities.

Under this category I placed all QA agencies complying with the ESG's criterion on students' inclusion on the grounds that they conceive no other way of behavior in such situation and take students' inclusion for granted as the only appropriate way to follow. Thus, agencies listed under this category are as follows: QAA (Scotland); FLANDERS; IEP; NOKUT; NAHE; FINHEEC; ACSUG (students represented with the full membership rights) and PKA (student's role not specified).

Students' participation makes the social reality of agencies and agencies justify students' participation by the conception that this is the rational way how they carry out their activities. Students appear as fully-fledged members of expert panels, are integral parts in agencies' operations and are also equipped with equal rights/roles as other expert members of the panel. Therefore, one could suppose that students' participation has gained its power within the cultural-cognitive framework of agencies and their authentic feedback/engagement is perceived as the strength of agencies' operations. In the context of above listed agencies the acknowledgement of the value added to evaluations processes/expert panels' judgments by students' participation has had a long tradition. It has been believed that their representation in the review panels could enhance the richness of the student perspectives on the Quality of offered education, add credibility to the conclusions made by the panel and facilitate the dissemination of evaluation results to evaluated institutions/other students. Therefore there is a shared understanding, conceptions and common beliefs about the importance of students' role in QA activities and students' dynamic engagement is actively encouraged.

In many cases students' role is not limited to the representation on external review panel, they are as well represented in other decision making bodies; for instance in NOKUT students participate in external evaluation panels, in expert committees, in the board of the Norwegian Agency of QA.

In the context of the above mentioned agencies one could assume that students' involvement was not introduced or encouraged solely by the ESG's criterion on their engagement, those agencies have actively endorsed students' participation into their activities even before those requirements were set and defined for every agencies, students' inclusion has been a shared belief/moral base for agencies' members and culturally embedded norm of those agencies. Agencies themselves valued benefits brought by their participation, therefore had no need to respond to this requirement with avoidance/defiance or mere conformity strategy.

Considering that some agencies (e.g. NOKUT, NAHE) conduct studies to obtain feedback about experiences of represented students on external evaluation panels to encourage students' further/more genuine participation and enhance their experience, one could assume that students' insights/perceptions are valued and their legitimacy/position is well protected within agencies' culture. Those agencies do not allow students' authentic participation and do not demonstrate the full compliance with the ESG merely to prove to their external environment that they fulfill their social obligation or try to prevent themselves from punitive sanctions. Acknowledging students as equal partners in QA activities has become a cultural expectation in the context of some HE systems (for instance in Finland). Establishment of a positive atmosphere where students' feedback is acknowledged valuable, reflective and constructive has gained its acceptance within HE communities and has promoted the evolvement of authentic dialogue/partnership between key actors of HE field. Students having the authority to design own evaluation mechanisms and participate as equal experts in assessment procedures are sound proofs that students' inclusion has become an authentic practice of QA activities and has not been triggered by externally imposed pressure/requirements. In the context of the above listed agencies one could anticipate existence of a normative match and congruence between values brought by the ESG and traditions of those external QA agencies, hence, one could predict mimetic/taken-for-granted basis of compliance with the ESG's criterion on students' participation.

The prevailing norms existing within agencies' cultures have facilitated students' efficient integration into the panels and provided an adequate ground to have their opinions taken seriously by other expert members, which reconfirms that the endorsement of students' participation in evaluation processes has become an appropriate and acceptable form of operation.

5 Conclusion

This study began with the premise that QA is, today, acknowledged worldwide as a central aspect of HE. External evaluations purport to ensure accountability and improvement of learning processes and students are increasingly recognized as pivotal in this process (e.g. participating in review panels). However, their role is far from being valued in the same way across different settings. In the context of the ESG requirement for students' inclusion in the external review process, this thesis purported to unfold the different weights and roles given to students in external QA agencies, the drivers and hindrances for their inclusion as well as their added-value to the process.

Therefore, the goal of this concluding chapter is to propose reliable responses to the queries of my research and to enrich the knowledge about the issues I explored. This chapter will be structured around my main and sub research questions, although I do not intend to explore to what extent European QA agencies are adapting to the ESG's criterion on students' inclusion in external review of HEIs once again, as I have already discussed each agencies' practices of the student involvement and identified their level of conformance with this specific requirement in Chapter 3.

5.1 The Drivers and Hindrances for Student Inclusion in European QA

Before moving to the aspect of compliance with the ESG, it is important to identify the driving force for students' engagement within agency's culture/operation and also analyze the factors preventing their authentic participation. The main drivers encouraging student participation in European QA are related to external factors, and to the environment in which the agencies function and carry out their activities. Many agencies operate in an environment which emphasizes the centrality of students, regards students as essential stakeholders, directs the focus of quality of education to the students' experience/needs and strongly encourages students' involvement in evaluative processes as credible evidence providers. Thus, external QA agencies function in an environment where students' participation is widely recognized and is actively reaffirmed by the ESG. As the credibility of European QA agencies greatly depends on the level of conformity to the ESG, they are prompted to pay close attention to adoption and implementation of established requirements within their objectives and

activities. There are also various other factors encouraging QA agencies to pay close attention to students' perceptions about the quality of offered education and allow their dynamic participation in agency's activities; one of those factors is agency's own principle to provide public confidence that the HEIs are exercising their responsibilities for the academic standards and quality of their programmes/awards in a way that safeguards the interest of students; Hence, to safeguard their interests QA agencies need to learn more if students are satisfied with the education they get which is possible if they allow their genuine inclusion in evaluation procedures and obtain feedback from them on educational processes. Throughout my research I explored to what extent different European external QA agencies remained attached to their underlying principle, how actively they managed to involve students in their activities and how adequately they safeguarded students' interests. Applying the ESG as the criterion for checking/confirming external QA agencies' compliance with the requirement on students' inclusion has been the handiest and most appropriate tool for my research: as students' participation in external review panels falls under the ESG's requirements, students' inclusion is strongly encourage by the ESG not only on agency/institutional levels, but also on national/supranational levels and each external QA is systematically inspected on its compliance with every ESG's criterion to reconfirm or obtain the full membership status of ENQA community.

Based on the above mentioned statements we can conclude that prevailing trends and current HE environment appear to be the main driving forces for student engagement in European QA, but where else can we look for hindrances for their participation if not in the organizational structure of the agency itself dominated by its unique cultural/belief and normative systems? In spite of the prevailing factors existing in the environment of external QA agencies: strong encouragement for student genuine engagement in QA activities by various actors, active endorsement of the concept of a quality culture perceiving students as full and equal partners in QA issues, identified need for granting more freedom to students to express their viewpoints about the quality of education they get and recognition of the added value brought by their participation to the judgments of panels, it is surprising to encounter cases where students' involvement has been either forgotten or neglected in the context of some QA agencies. Therefore for finding explanations for the hindrance factors and varied reactions to one and the same ESG's criterion (students' representation in external assessment panels) from various European QA agencies, I've referred to the new institutional theory, which calls attention not only to cultural, normative and legal frameworks existing in the

environments of organizations but also to the formal governance structure/norms and beliefs existing within each agency. This theory assisted me to explore organizational character, ongoing internal processes and grounds/prospects for further organizational change in response to the external environment within different agencies' contexts. By exploring organizational structure/culture and prevailing norms existing within the agency, I identified various factors stemming from those aspects which had eliminated students' dynamic inclusion in agency's activities. For instance agencies with no prior tradition of student engagement in agency's operations demonstrated more resistance to the new requirement imposing their inclusion than those agencies with already well established practices of student participation. Such resistance could have been caused by the fact that members of the agency did not regard student's involvement valuable for agency's well-being and their participation was not perceived as an appropriate behavior/norm within the agency's culture.

Once imposed with the ESG, every agency could have questioned if this requirement applied to them, who determined such obligation and on what ground for them, if there was the real need for their conformity and simultaneously observed how other QA agencies reacted to the same requirement. Although similar requirements as a matter of fact could not guarantee prompting similar responses from all agencies, as they were inclined to act not only collectively, but individually as well. Knowledge about the pre-existing organizational pattern of the agency was rewarding for me, as based on it I justified the manner the agency reacted to a new requirement. Compulsory ESG's requirements if met with much resistance from the local level could trigger automatic conformity, cause cosmetic, superficial changes only to the surface systems and opt some agencies to respond in a ceremonial manner (making changes in formal structures to signal conformity, but buffering internal units and allowing them to operate independent of those external pressures); I have encountered cases of such ceremonial compliance in the context of some reviewed agencies, which have officially introduced students into their operations, but have limited their role to an observer/assistant's status. Hence, they have succeed in adopting a new requirement, but failed to carry out the adequate follow up procedures to sustain the conformity or failed to embed this requirement more intrinsically into agencies' local culture. Taking into account the fact that students have been represented more profoundly in external evaluations of HEIs in some agencies (e.g. NOKUT, NAHE, IEP) than in others, I can conclude that those agencies have demonstrated more responsiveness to environmental changes and have succeeded in early adoption of standards; those agencies which only adopted already accepted standards later, could have been handling

this matter in a more ritualistic pattern, mechanically following standards and imitating the practices of other proficient and well-established QA agencies. The adoption of the ESG could have been triggered by fear for punishment, as non-conformance to a new requirement could regard them as deviant, inattentive or behind the times and such inappropriate behavior could result in a loss of legitimacy. As legitimacy and functionality are essential for every agency they are enforced to comply with imposed requirements dominated in their environment in order to survive. Adequate compliance with those regulations grants every agency with the full membership status of ENQA community which guarantees the trustworthiness of its operations in the eyes of other European QA agencies, therefore such compliance is favorable.

5.2 Possible Explanations for Variation in Students' inclusion in QA

The concept of students' involvement in external review panels is acknowledged among European QA agencies. This statement has been justified by the information provided in agencies' reviewed reports according to which they all recognize to some extent the necessity for student inclusion and potential advantage/benefits brought by their engagement. Having analyzed the reports assessing European QA agencies' operations and conformity to the ESG, I discovered not only similarities but also variations among them. Detected similarities in the nature of agencies' operations and reactions to externally imposed pressures can be justified by the following facts: as QA agencies represent the "organizational population" of European QA agencies, are imposed to the similar environment/external pressures and common normative frameworks/regimes developed for them at a global scale and fall under the need to demonstrate their connections and congruence with wide belief and rule systems, they are inclined to demonstrate some resemblance to each other. But as European QA agencies have diversified organizational structure/characteristics, go through different stages of development, are built on different pillars of regulative/normative or cultural-cognitive systems and function in different national contexts, as a result they transform into three contrasting models of institutions. In spite of the general tendency for students' active engagement in agencies' operations we still encounter variations in the level and intensity of their participation. Application of different implementation procedures and different strategies for compliance to the ESG in the local level could explain observable variations among agencies. As every QA agency represents one of many types of organizations existing within the HE sector, I applied the new institutional theory to explore/explain the nature of compliance, give possible justifications for observable reactions to the externally enforced change and ongoing operations within agencies. Similar to other types of institutions every agency is meant to possess its own structure, culture, traditions, belief systems, sense of community within its members, defense/conformity mechanisms once imposed with the need for change; Knowledge about those aspects are essential as agencies foresee the requirement on students' inclusion through their own logic of appropriateness and norm/value systems prevailing in their internal culture/structure and external environment/national context: *some committing conformity to this requirement as taken for granted and appropriate behavior; but in the context of some agencies compliance occurring as the result of normative application*

or being enforced by dominating legal/rule-like frameworks. I referred to Burton Clark, Ase Gornitska and Richard Scott for my theoretical framework as they have deeply explored above mentioned factors and have applied the knowledge about those aspects for giving justifications for organizations' actions and variations among them. Based on their perspectives one could assume that those agencies strongly believing in benefits brought by students' feedback/participation in assessment procedures and having previous practices of their engagement could comply with the ESG's criterion on students' inclusion with less resistance than those agencies which had no prior student inclusion in their activities or questioned their knowledge and expertise for assessment procedures. The agencies treating students unequally could demonstrate mere superficial conformity to the ESG. Voluntary and genuine compliance with the ESG's criterion on students' engagement could only become a reality within the agency's structure if its members themselves acknowledged the need for students' authentic engagement and allowed such occurrence. For interpreting the nature of compliance within European agencies I referred to Richard Scott's perspective on regulative, normative, cultural-cognitive systems representing essential ingredients/pillars for constructing/supporting institutions and three mechanisms: coercive, mimetic and normative applied for circulating external effects locally. Prevalence of one system (for instance: regulative) over another one (e.g. cultural-cognitive) could make agencies distinguished from each other, each identified with a distinctive basis of compliance, mechanisms of diffusion, type of logic, cluster of indicators, foundation for legitimacy claims and social order. One could explain detected variations among agencies in responses to the similar requirements through diversified logic of appropriateness established within individual agency, as every agency could actively interpret the demand for change/new requirement through this logic and react in accordance to it; therefore if different QA agencies did not share common viewpoints and logic of appropriateness concerning students' participation in their activities they would be inclined to react differently. The pre-existing organizational patterns could account for the relative success of each strategy applied while imposing the implementation of a new requirement. Hence, if a new regulation falls out of the frame of local culture, structure, norms and established logic of appropriateness of the agency, it is less likely to succeed in obtaining an acceptance from its members in spite of the strategy applied for its implementation. However restrictions to students' engagement cannot be entirely "blamed" on agencies' lack of eagerness to adopt a new requirement; the national context and students' position within academic community should also be taken into consideration to predict the

possibility for their engagement. In those countries (for instance Norway, Finland, the Netherlands, and Scotland) where students are perceived as equal partners in academic community and are actively represented in decision-making bodies of HEIs the adoption of the ESG is likely to take more natural acceptance as students' presence in educational activities is perceived as an approved and culturally expected norm.

Hence, differences in internal institutional dynamics (structure, culture, norms, beliefs, implementation procedures, applied strategies, nature of compliance) and external environment of European QA agencies could explain detected variations in the practices of students' engagement.

5.3 Added Value to External Review Procedures by Students' Engagement

The Student engagement in QA activities has not had a long history, hence, students' liability to express their viewpoints openly in respect to educational and QA issues has been rather limited in the previous times. The situation in this context has been changing due to current European trends (Bologna Process, Berlin Communiqué, ENQA standards): perceiving students as full partners in HE governance, strongly encouraging the co-operation and commitment of all partners (HEIs, students and other stakeholders) in education processes and prompting students to become active participants in the design and delivery of their educational experience. Dominating *quality culture* also emphasizes that current students, fully responsible for their own future, must experience the QA processes and be able to interpret QA processes/procedures by themselves; as a consequence students' voice has been gaining its authenticity and power within HE community gradually, but consistently. Nowadays students' participation is meant to increase the credibility of QA processes and enhance student learning experience. Various ongoing transformations taking place in the HE sector have reshuffled students' role within HE sector and have brought the need for their active participation in QA activities. Acknowledging teaching and learning as an useful joint venture of HE, placing emphasis on centrality of students (on learning by students rather than on teaching, making students learning expectations as the focus of quality of education), encouraging active development of the student (not regarding the student as a passive subject), choosing a student-oriented (customer-oriented) approach to education, bringing students' needs, requirements, and perspectives to the forefront of attention have once again highlighted the necessity of their active involvement in every stage of educational processes. Since nowadays the main goal of education is to equip students with adequate knowledge/skills and better satisfy their needs and expectations then students should be permitted to express their opinions more freely about the quality and efficiency of available education. Having student representatives in quality assessment procedures is meant to enhance the quality of assessment itself and enrich evaluation procedure by students' perspective and feedback; they can appear as credible evidence providers in the evaluation teams by bringing different perspective to students' issues/concerns supported by the assumption that they are more knowledgeable about those issues than other expert members.

Why are students' viewpoint and participation so essential for QA? There can be various answers given to the imposed question, but one of possible answers is that students have a very unique vision of teaching and learning as they themselves undergo the education process and comprehend what it means to be a student. Hence, knowledge about their perceptions concerning the quality of education will enhance the understanding how to design HE system (curriculum) actually working for them and improve their academic experience. By their inclusion it will be possible to obtain a clear understanding of the impact of QA measures on students which could prevent QA from becoming a bureaucratic exercise and make it more matching to their needs. As students are recipients of education and have a clear view how it can be improved, the quality of education/quality of the university's education can be improved by using their constructive feedback, input and ideas about advancement of learning and the quality of their own learning. If students are given what they actually expect from their education, they will feel more engaged and responsible for their own learning and such commitment will facilitate learning/teaching processes.

By students' genuine participation it will be possible to obtain better insight in how to make course material more exciting and engaging for them and obtain an in-depth and richer picture of students' experiences. Not only evaluation panels but even HEIs benefit from students' involvement as they get clearer idea about what students want, need and how they react to what they are provided with; they also benefit from their feedback on teaching and assessment methods as this feedback comes from the perspective of an user. One more advantage of using students in QA activities is that they can communicate the outcomes of evaluation to their peers and colleagues and also the importance of the role played by them in those procedures.

As nowadays students do not appear as mere users, but collaborative partners in educational processes and benefits brought by their participation in QA activities are well acknowledged across Europe, one could argue that the role of students in the QA of HE has become accepted as both essential and desirable.

5.4 Concluding Remarks

Treating students as experts is a cultural expectation which requires a supportive attitude not only from experts but also from students. Experts should believe in the value brought by students' feedback and students themselves should recognize that they are capable of influencing evaluation procedures. Promoting a cultural expectation on student engagement in QA activities and granting them equal rights is possible if their inclusion is encouraged not on global and agency levels alone, but initially at the institutional level. National legal measures for ensuring students' involvement should be put in place and networks for enhancing students' participation should be set up. Clear policies and objectives should be defined illustrating what is meant by student engagement and to what extent their participation is desired. Shallow justifications claiming students' lack of interest in QA activities and inefficient knowledge/experience for assessment procedures should be eradicated and such discrepancies should be rectified by advertising students' position on external evaluation panels more actively, defining the role and function for their position more clearly, clarifying value/benefits/contribution brought by their participation not only for students but as well for other expert members and providing adequate trainings for recruited students for preparing them for evaluation procedures. A unified commitment from all levels of QA should be provoked to encourage students' authentic and full engagement. For promoting students' more active and legitimate inclusion more relevant studies should be conducted not only on the agency but as well on the institutional level. Where there is no students representation in QA activities, enquiries should be made directly to students/academics at HEIs to identify the causes for their exclusion and obtain feedback from students/academic and administrative staff about the rectification of this situation. In the agencies where students are represented on panels and participate in agencies' regular operations, further investigations should be launched to find out how students perceive their role, if their status/authority is approved within agencies' culture/by other members and what recommendations can be implemented to facilitate their more dynamic and legitimate inclusion.

The main innovative aspect of this research is that it fills a gap in existing studies on external review panels and their environment with a particular emphasis to the role of students. This far, the study of students' role in external review panels within European external QA agencies has been neglected. The aim of this piece of work was to take a closer look at this particular angle and contributed to the understanding of this important dimension of quality

assurance practices in Europe. This particular study explored factors/aspects prompting similarities and differences in the nature of responses and compliances to one and the same ESG's criterion on students' participation from various European QA agencies' perspective. Those factors and empirical data were theoretically analyzed, explored and justified. By applying the *new institutional theory* I gave explanation/subsequently rationalized the characteristics of agencies' operations, identified features triggering their full, partial or no compliance and presented the research findings through the theoretical framework.

The scarcity of previous research conducted on this particular topic and incomplete information presented in ENQA coordinated external review reports assessing QA agencies' conformity to the ESG was a complication in the process of my research. Some ENQA reports merely stated the compliance or non-compliance with the ESG, but failed to justify or further explore on what grounds the panel had reached such conclusions. As the primary data used for this research presented solely ENQA's perspective in respect to this issue and the judgments made by the expert panel composed of six members, further research should bring in other actors' perspectives on this issue. I myself referred to individual QA agencies' web-pages (reviewed self-evaluation reports, procedures on students' inclusion, etc.) to explore in more depth the limited information available on this topic and incorporated the obtained information into my research. To validate my findings further, and justify the appropriateness of classifications applied to various European external QA agencies based on the detected indicators of similarities/differences in their culture/operations/applied strategies/nature of compliance, I could explore more explicitly and comprehensively the extent of students' inclusion in the context of each individual agency and verify if those conclusions could correspond and validate my current findings. In-depth analysis of documents produced by each agency and conducting inventories of experts and students represented on external panels on students' role in evaluation procedures/ the value brought by their participation would also enrich the knowledge on this particular issue. Finally, interviews with represented students would give useful insights into their level of satisfaction with their involvement and exploring their experiences in review panels. This would yield further recommendations for enhanced students' engagement based on my new findings.

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